Professor Sue Law
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Higher Education Academy
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York Science Park
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13 January 2011

Dear Professor Law,

ALT is pleased to respond to the Higher Education Academy's Consultation on the UK Professional Standards Framework. Contributors to the response included Haydn Blackey, Alexander Borovik, Barbara Newland, Martin Oliver, Seb Schmoller, and John Slater. The views expressed are those of ALT rather than the individuals who contributed.
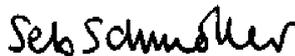
ALT is a professional and scholarly association. Our charitable object is *"to advance education through increasing, exploring and disseminating knowledge in the field of learning technology for the benefit of the general public"*. Our six current aims are to:

- represent and support our members, and provide services for them;
- facilitate collaboration between practitioners, researchers, and policy makers;
- spread good practice in the use of learning technology;
- raise the profile of research in learning technology;
- support the professionalisation of learning technologists;
- contribute to the development of policy.

We have over 200 organisational members including most of the UK's universities and many FE colleges. Most of our over-700 individual members work in UK HE and FE. We thus cover all the parts that make up the "HEA Community".

We have a Memorandum of Understanding with the Academy, with which we have an excellent working relationship, and we have worked closely with it where our aims intersect, principally in relation to technology enhanced learning and to the professional development of learning technologists. In particular, in 2008 we jointly agreed a statement *ALT Certified Membership (CMALT) and recognition as an Associate or Fellow of the Higher Education Academy and accreditation of an institution's staff* showing the links between CMALT and individual recognition and/or institutional accreditation under the current Professional Standards Framework. We very much hope that under the new UKPSF it will again be possible jointly to produce a revised statement covering this area.

Yours sincerely,

Seb Schmoller
Chief Executive

Consultation question [1]

Do you consider that the original aims of the UKPSF remain appropriate?

Yes. We suggest the inclusion of "all" before "staff" in the first bulleted aim.

Consultation question [2]

a. Comment is invited on both the content and structure of the revised UK Professional Standards Framework (Standard Descriptors) in Appendix 1.

The proposed new structure is welcomed, building as it does on the established and broadly successful existing framework. In particular, the new descriptors for Principal Fellows are likely to be welcomed by the community that ALT represents. Many of our members have been interested in and have actively pursued Associate Fellow status but were excluded from Fellow or Senior Fellow status by the kind of activities associated with their role. The sub-set of our members holding senior positions in Higher Education, however - such as the group that constitutes the Heads of eLearning Forum - would be fairly well placed to submit for Principal Fellow status, although the proposed role/career stages tend to be overly focused on teachers at the expense of others with a learner- or learning-support role, such as learning technologists, staff developers, librarians etc.

It would be excellent to provide a greater continuity for our members through the intermediate levels of Fellowship proposed here, and we would welcome the opportunity to work with you in identifying examples of evidence appropriate to our membership that would satisfy the Framework requirements. We believe that this would create opportunities for members of ALT to engage with the Fellowship scheme without expecting undue adaptation of what is, by necessity, a more general scheme.

There are various places where wording needs to be tidied up, for example substituting "s" for "z" in various places and replacing "incorporates" by "incorporate" in the middle bullet point in the middle column of the first page of Appendix 1.

We are somewhat sceptical as to whether those who have been at least one step removed from teaching and learner delivery or support for many years (VCs, DVCs etc), could always properly be described as being at Level 4 in a framework that focuses on these matters.

We would counsel against use of the term "innovative" in the bullet point two of the Typical Activities associated with Senior Fellowship since there is no *a priori* reason why an approach that is innovative will necessarily be effective.

Overall, the document also needs to be reviewed to ensure that its meanings and applicability are clear for the many staff involved in HE provision in FE colleges. At the moment there is a tendency for university terminology to be assumed.

b. Comment is invited on the content and structure of the table in Appendix 2, which provides further underpinning detail regarding the Areas of Activity, Core Knowledge and Professional Values.

The table is clear and accessible, and generally helpful in guiding expectations in relation to the Framework. Further modification could enhance this, however.

For example, Area 1 makes it clear that the list of activities is indicative, whereas Area 4 suggests that the three activities are required (media and technologies; kinds of learners; modes of learning) with room for variation only within each of these. Greater consistency in the specification of required and illustrative components would be helpful.

It would be possible to quibble with particular phrasing - e.g. whether the examples listed in 4 are all appropriately described as 'modes' - but it seems unlikely that any form of words will satisfy all possible stakeholders and this current set seems clear enough. (There is, however, a typo in evidence under Area 4 -

"for a" should be "fora") It was surprising, and in our view unwise, to have positioned "learning style constructs" as core knowledge, given recent critical reviews of the lack of reliability or validity of these (e.g. Coffield et al, 2004). We suggest the inclusion of the word "appropriate" before "engagement" in the activities section of A4.

In B4 there are two points in one in "A range of technologies to enhance learning, including current innovations which support a diversity of learners, including those with visual and/or audio impairments". These need to be split, for example into:

- "A range of technologies to enhance learning, including current innovations"
- "Technologies to enhance learning through supporting a diversity of learners"

In relation to the second point, the focus should not be restricted (as is the case with the proposed wording) only to those with visual and/or audio impairments.

It might also be better, in relation to evidence for core knowledge about the use and value of technology, to replace "accounts of use" with "critical accounts of use", or, better still, "accounts of use that demonstrate awareness of the value and limitations of particular technologies". (The same may hold true for the evidence suggested in relation to evaluation.)

The phrase, "quality culture", in relation to Core Knowledge area 6, may need to be revised to make the intended meaning clearer. (It may be clearer to say something like, "a culture that values quality", if this is what is intended.)

We believe that teamwork should figure in either A or B, and, for the same reason as stated in relation to Appendix 1, we are dubious about the inclusion of "innovative" before approaches to assessment and feedback in 3A.

The value relating to global citizenship did not seem to have a clear citizenship-specific demonstrator associated with it.

It is important that the emphasis on innovation is counterbalanced. In particular, a way needs to be found to ensure that practices which are crucial to the success of universities and colleges, such as considered second marking, resolving discrepancies, meeting deadlines, being reliable (including turning up!), and especially having concern for colleagues are seen as important. Perhaps this could be done by ensuring that at least one of the demonstrators for C1 references colleagues rather than having an individual focus.

c. Comment is also invited on the shorter and refocused title of the Framework.

We are content with this.

Consultation question [3]
Comment is invited on the way in which the Framework addresses the importance of recognising the integrated nature of academic roles and responsibilities, whilst maintaining a strong and central role for teaching and learning within the UKPSF.

This is a difficult balance to strike. The introductory text certainly positions this as important, and there is evidence of links within the framework described in the Appendices, for example, where disciplinary scholarship is identified as suitable evidence in relation to learning and teaching activity. However, given the focus of this document, the relationship is necessarily one way: senior administrative duties and disciplinary scholarship can provide evidence in relation to the framework, which is learning and teaching oriented, but there is no real opportunity to discuss how learning and teaching activity can inform administration nor disciplinary scholarship. (Less leadership-oriented administrative duties do not seem as well integrated with the framework in either direction, even though these can be important.) This one-way relationship may now seem appropriate, given the document's focus, but it should also be noted that in the changing environment

where many teachers will be solely funded by student contributions it may be increasingly necessary to make this a two way process. Certainly, in third stream areas (for instance) this should not be impossible.

Consultation question [4]
Whilst members of ALT undoubtedly have strong views on the issues addressed in this section of the UKPSF, these matters are not central to ALT's own remit. We therefore make no response to this consultation question beyond noting that it is important that internals better understand the role of the external within an institution in order to improve their own performance as internals of the system.

Consultation question [5]
Comment is invited on the practical implications of introducing a formal requirement for subject/disciplinary based support for a. mentoring

This could be of great benefit, but potentially becomes an extra administrative burden. Many institutions already have mentoring arrangements for new staff. It would be valuable for this to be recognised, and for a commitment to be made to work with such existing schemes to enhance them, rather than the risk of imposing a parallel and possibly unhelpful scheme alongside this.

b. teaching observations

As with mentoring, many institutions already have procedures for teaching observation in place – applying to all teaching staff – and it may be counter-productive not to build on this. It will be particularly important to emphasise the quality enhancement aspects of this process, to reduce the risk of this being seen as yet another audit process, an invasive 'Big Brother' mechanism, or a waste of time. It will be important to emphasise the value of these schemes, at their best, as an opportunity for professional development and for the enhancement of the student experience. The form of words currently used in section F (5.8) is unhelpful in this respect, emphasising compliance and basic competence rather than opportunities for development.

c. discipline-focused module (or equivalent)

We have no comment to make.

Consultation question [6]
Comment is invited on how far the guidance provided in the Framework is appropriate with regard to new and emerging technologies.

Our response here should be read in conjunction with earlier comments. We are happy that the document lacks specificity about particular new or emerging technologies; this seems entirely appropriate, since over-specification will not stand the test of time. The important points here concern the thoughtful and appropriate use of technology, in line with professional values. This is well expressed in the section about criteria for promotion - "innovative and critical use of newer technologies for teaching" - although as we make clear above it is important to recognise that "innovation" is not always a 'good'. "Appropriate and critical use of newer technologies" might combine the best elements of the ways in which this topic is covered in different parts of the document. In relation to this issue, explicit reference to our Certified Membership Scheme (CMALT) as an example of appropriate evidence would probably be appropriate at some point in the Framework.

Consultation question [7]

Comment is invited on the location of the sustainability focus within 'global citizenship', one of the Framework's professional values.

The location seems appropriate.

Consultation question [8]

Comment is invited on the proposals under the section headed 'qualified to teach' with particular reference to their feasibility within, for example, the current economic and higher education policy climate.

The principles identified here are important and build on developing practice in the sector. However, it would be helpful to indicate the kind of responsibilities that count as 'teaching'. There are many cases, particularly in relation to post-graduates and support staff, where individuals undertake low-risk teaching activities as part of a course that is the responsibility of someone else; for example, through a short guest lecture or demonstration. It would be unfortunate for these experiences - which are an important opportunity for those new to teaching - to be ruled out because a 20 credit course had not yet been undertaken – and indeed that would correctly not be accepted by the community. Moreover, such teaching may need to take place as part of such a course, in order to provide experiences on which the candidate can reflect. Some modification of the text to support and even encourage such formative early experiences would be welcome.

Turning to the specific recommendations, we: support 1; suggest a softer and less specific formulation of 2, noting that a sector-wide "fundamentals of teaching and learning" module, possibly of shorter duration than 20 credits, would be suitable for delivery using online learning; are sceptical about the value and long term feasibility of 3; and suggest that 4 be moved to the earlier section on CPD.

Separately there would be merit in requiring all those with teaching responsibilities to engage in appropriate teaching and learning related CPD, something which is already the case in FE.

Consultation question [9]

a. Comment is invited on the potential use of anonymised information about higher education teaching staff qualifications and fellowships.

We strongly support the publication of data about teaching staff qualifications by department or academic unit, but we believe that institutions – which can be held accountable for the data in a way that the Academy cannot – should make this information available as part of the enhanced data-set that is expected to become the norm as a result of the current HEFCE/UUK/GuildHE consultation on changes to information published by institutions.

b. Are there any potential benefits and/or drawbacks you that would identify?

We have no comment here.

Consultation question [10]

Comment is invited on the potential for greater collaboration with regard to professional standards related to teaching, between the Higher Education Academy and other professional bodies/associations.

We would agree that there is the potential for greater collaboration, and would welcome such engagement. In particular, we see opportunities relating to the modelling of progression pathways through the various levels of Fellowship for members of our Association, and can imagine productive work around illustrating, supporting or assessing the appropriate and critical use of newer technologies to support learning and

teaching. As we make clear in our covering letter, in 2008 we jointly agreed a statement ALT Certified Membership (CMALT) and recognition as an Associate or Fellow of the Higher Education Academy and accreditation of an institution's staff showing the links between CMALT and individual recognition and/or institutional accreditation under the current Professional Standards Framework. We very much hope that under the new UKPSF it will be possible jointly to produce a revised statement covering the same ground.

The numbers of staff at different stages of their careers in individual institutions and in particular disciplines tends to be small. There is therefore considerable scope for institutions to collaborate on their CPD activities, especially if these involve some measure of online learning, to achieve sufficient economies of scale to make excellent CPD viable and cost-effective.

Consultation question [11]
Comment is invited on the revisions to the Framework with respect to the Standard Descriptors, including the introduction of Standard Descriptor 4: Principal Fellowship.

See our comments above especially in response to Consultation questions 2 and 8.

Consultation question [12]
Comment is invited in relation to:
a. The appropriateness of the potential criteria/indicators outlined in Appendix 4 and the degree to which these reflect the focus adopted within individual institutions.

We suspect Appendix 4 to be both too detailed and too rule based. Instead just as promotion is usually based on an application and is a judgmental process, then, as with research, candidates should put things in their submission which can be independently checked and verified. It would be very unfortunate if teaching were reduced to box ticking and prequalification as a result of such a framework. Thus we recommend that what is important is up to the applicant to suggest and the relevant institution to judge. Phrasing that suggests what institutions might wish to consider is likely to have a more positive impact. Input from students is likely to grow in importance over time. It is also important that the criteria/indicators are appropriate for those in roles such as staff developer or learning technologist.

b. The appropriateness of the likely sources of evidence outlined in Appendix 4 and their potential value within individual institutions.

See answer to a. It is important to leave this with institutions.

c. Possible approaches to 'populating' the various career stages (i.e. how far any of the evidence sources might be seen within individual institutions as 'essential' or 'desirable' for particular career points).

See above. Trying to formularise runs the risk of trivialisation and removal from the real process.

16/1/2011