

AQF Council

Innovative Research Universities (IRU) response to Consultation Paper *Strengthening the AQF – An Architecture for Australia’s Qualifications*

IRU welcomes the broad structure of the proposed framework and the setting of scaffolded and hierarchical learning outcomes that provide for greater clarity in classification of qualifications into categories. We suggest that once finalised there should be tighter regulation of compliance with the qualification categories, rather than the current situation where they are sometimes used as optional guidelines.

The proposed AQF needs to be carefully assessed in the context of other current higher education processes and developments including CRICOS registration, the Bologna model and strengthening Pathways in post-school education. For example, the descriptor for the Doctoral Degree specifies a notional duration of 3-5 years. Have the consequences for the award of PhD scholarships funded by DEEWR been explored? Will a candidature of 5 years be supported by scholarships?

We would like to see greater clarity in relation to the distinctive learning outcomes for vocational education and training and higher education qualifications. This might include consideration of the context, including approach to scholarship, in which programs are taught. The Boyer Model of Scholarship provides a useful reference point for defining the nature of ‘scholarship’ versus the equally important nature of vocational learning.

If we are to produce ‘global citizens’, we also need to be sure that the proposed model will be well received internationally. If not, this could have impacts on the demand for our programs by international students and the employability of our graduates internationally.

Question 1: How well does each levels attribute express the level?

Level 3 appears to be anomalous insofar as the Level Attributes specify ‘Knowledge and skills for further higher education and training...’ where all other levels refer only to ‘further learning’. IRU believes the Level 3 attribute should be changed to be consistent with the other levels.

Level 4 specifies ‘theoretical and practical knowledge and skills...’ which is a departure from the descriptor for the Certificate IV under the current AQF. This will mean substantial curriculum development in this qualification category.

Question 2: How well do the levels criteria explain the relativities between levels? ...

The grouping of Certificate III with the Senior Secondary Certificate of Education at Level 3 suggests that either would be regarded as suitable preparation for higher education. In the case of the Certificate III this would require substantial upgrading of the curriculum and expected learning outcomes if graduates wish to pursue higher education studies rather than vocational education.

Levels 5 and 6 are not as well differentiated as some of the other levels. The distinction between the learning outcomes for the Diploma and the Advanced Diploma is not strongly made.

There needs to be a clearer differentiation between (vocational) Advanced Diplomas and Associate Degrees. The focus of the former is on preparation for a vocational outcome, while the focus of the latter is on both a vocational outcome and preparation for Bachelor degree studies. The placement of both at Level 6 of the framework is appropriate. The role of Associate Degrees in the delivery of higher education in Australia is likely to increase given the government's higher education attainment and low SES participation targets.

A recent ALTC funded project, *The Role of Honours in Contemporary Australian Higher Education*, found that while the Bachelor Honours level has multiple meanings and models, it has a pivotal location between undergraduate and postgraduate degrees and there is general agreement by stakeholders on three core defining curriculum features. It also found that Honours degrees are highly valued within the Australian higher education sector but 'under-marketed' outside of it. In many disciplines, the separate post-Bachelor Honours year remains (notwithstanding its current technical status as undergraduate studies), as a specific recognised level in a clear award hierarchy, with entrenched links to Higher Degree Research awards. Our view is that the AQF should acknowledge Bachelor Honours as a distinctive qualification type at Level 8, as indicated in Attachment 1.

Question 3: Please provide any suggestions for refinement.

We have concerns about the apparent focus on the learning outcomes at the lower levels being specified as routes to employment. There is mention of pathways to further learning, but little overall emphasis on the acquisition of skills and knowledge to foster lifelong learning. We note the intention to develop information about pathways to include in qualifications specifications and think that this is a significant omission in this proposal. For completeness, each qualification category should specify expected entry requirements as well as outcome attributes.

Question 4: Please comment on the qualifications types descriptors and provide any suggestions for refinement.

The proposed Knowledge descriptor for the Diploma (Level 5) is entirely focussed on technical and vocational outcomes. Within the university system, there is increasing demand for undergraduate Diplomas which have similar entry requirements to the Bachelor Degree (year 12 or other pathways) They are typically designed to build foundational knowledge in a disciplinary area, allowing for the Diploma to be either an exit point or a pathway to further higher education studies, sometimes as a nested qualification within the Associate and Bachelor Degrees. It is anticipated that the need for qualifications of this type will significantly increase as institutions strive to respond to the government's higher education attainment and low SES participation targets.

Undergraduate Diplomas are typically of one year duration and IRU suggests that the notional duration of student learning should be set at 1-1.5 years. Alternatively, there may be a case for differentiating between Vocational Diplomas and Undergraduate Diplomas.

Question 5: Will more explicit qualification type descriptors resolve concerns with AQF qualifications, for example the diversity within qualification types such as the Certificate III and the Masters Degrees?

The proposed framework acknowledges only one of the types of Masters level qualifications being offered (i.e. Masters by Research requiring an externally examined research component). There are two other types of Masters level qualifications:

1. Masters by Coursework (extension of previous area of study)
2. Masters by Coursework (graduate entry from non-cognate degrees).

Our view is that the AQF should acknowledge all three types of Masters degree as distinctive qualification types at Level 9, as indicated in Attachment 1. Similar issues are addressed in Question 8 in relation to Graduate Certificates and Diplomas.

With respect to the notional duration of student learning for Masters qualifications, IRU believes that 1-2 years is appropriate assuming a 4+1 (ie 4 year degree plus 1 year Masters) or 3+2 (ie 3 year degree plus 2 year Masters) configuration. That is, a minimum of five years study should be required to complete a Masters degree.

The proposed framework only specifies the traditional research PhD at the Doctorate level. The framework needs to acknowledge the Professional Doctorate (combination of coursework and research) as a distinctive qualification type at Level 10, as indicated in Attachment 1. While the Professional Doctorate needs to include some component of research, IRU argues that the current Research Training Scheme requirement of 2/3rds research should not be specified. More flexible criteria should be applied: for example 'an externally examined thesis or report' and demonstration of 'a substantial contribution to professional knowledge and/or practice through research'.

The suggested duration of 3-5 years for the Doctorate qualification type is appropriate.

Question 6: It is proposed that the Senior Secondary Certificate of Education is placed at level 3. Does the qualification type descriptor adequately reflect this level?

The descriptor for the Senior Secondary Certificate of Education seems appropriate, but is oddly grouped at Level 3 with the Certificate III.

Question 7: Is there a case for qualifications leading to a trade outcome to be identified as a different qualification type?

As mentioned above, there are distinct types of learning outcomes for higher education programs and trade qualifications, which relate to learning contexts including approach to scholarship and expected graduate destinations. Perhaps there should be Vocational Diplomas and Vocational Advanced Diplomas.

Question 8: Is there a case for only one kind of the Graduate Certificate and the Graduate Diploma qualification types?

Current wide practice in the higher education sector is to distinguish between post-degree Certificates and Diplomas as:

1. Graduate Certificates or Diplomas where the curriculum consists of material offered at least at fourth or honours year level which pursues the undergraduate discipline at a deeper or broader level, developing cumulative, sequential and specialist discipline knowledge, and for which a Bachelor degree or equivalent in a cognate discipline is an entrance requirement.
2. Graduate Certificates or Diplomas mainly consisting of material offered at the undergraduate level to develop knowledge and skills in a new discipline or area of study. A Bachelor degree or equivalent in any discipline is an entrance requirement. An example could be Bachelor of Business followed by a Graduate Diploma in Languages.

Our view is that the AQF should acknowledge these as two distinctive qualification types at Level 8.

These post-degree qualifications are normally of 0.5 years duration (for post-degree Certificates) and 1 years duration (post-degree Diplomas), and are distinct from the Diploma (Level 5) which does not require a Bachelor Degree or equivalent for entry.

Question 9: Is the notional duration of student learning a sufficient measure for each qualification type?

We appreciate the responsiveness of the AQF Council in using notional duration of programs to clarify and operationalise the previously mooted volume of learning and strongly support this direction.

At the recent consultation meeting in Sydney, the AQFC Secretariat advised that the notional duration of student learning is intended to be an indicator of workload, with one academic year equivalent to two semesters. To support the regulation of compliance with the AQF, IRU recommends that the Framework provide a more robust definition of what is intended by the number of years specified. It may be more transparent, for example, if the duration was specified as 'FT semesters', with some description of what constitutes a FT semester.

Regulation of compliance with the AQF must ensure that a qualification meets both the notional duration of learning requirement and the specified learning outcomes for the qualification type.

Clarification is required, however, as to whether duration periods are intended to be strictly cumulative or potentially overlapping. The former approach is consistent with the hierarchical structure which we support as a useful framework. On the other hand, the latter approach seems necessary in at least some instances but might cause difficulties with the hierarchical descriptors. For example, is the doctoral duration of 3-5 years envisaged as 3-5 years after the completion of a Masters degree as the intended pathway, or could it be (as is common practice now) 3-5 years after (for example) a 4-year Bachelor or 3-year Bachelor plus 1-year Honours or 1-year Grad Dip?

Question 10: Does the location of each qualification type in Table 3 reflect coherence between the qualification type and the level?

See response to Question 2.

Question 11: Do the descriptors for the six qualifications types listed reflect their proposed level location? Or is there a case for any of the six to be located at a different level?

See responses to Questions 4 and 8.

Question 12: What mechanisms are needed to assist the consistent application of the qualification requirements in the development and accreditation processes?

We recommend the specification of entry requirements as well as outcome attributes to more clearly identify pathways (See response to Question 3).

Question 13: Are there other considerations for adding or removing qualification types from the AQF?

No comment

Implementation Issues

If the descriptors for the post-degree qualifications are applied as in the discussion paper there will be numerous changes required in order to fit existing programs to the new framework. In the case of programs currently being advertised overseas, there will be an obligation for these to be taught as advertised and under current CRICOS registration. Does the AQFC have a timeline in mind for the implementation of changes? Will there be funding support for the massive changes required, especially with respect to post-degree studies?

How will the proposed changes converge with other initiatives including pathways and improving access for low SES students, the creation of TEQSA and increased focus on academic standards? (The clear statement of learning outcomes in the AQF will underpin future work on academic standards in Australia).

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Level 7	Level 8	Level 9	Level 10
Bachelor	Bachelor Honours <i>(Research)</i> Postgraduate Cert/Diploma <i>(extension of prior area of study)</i> Graduate Cert/Diploma <i>(new area of study)</i>	Masters by Research <i>(Research)</i> Masters by Coursework <i>(extension of prior area of study)</i> Masters by Coursework <i>(new area of study)</i>	PhD <i>(Research)</i> Professional Doctorate <i>(coursework and research)</i>