

28 April 2010

Ms Anne Doolette

Executive Director

Australian Qualifications Framework Council

GPO Box 320

Adelaide SA 5001

Dear Ms Doolette

Innovative Research Universities (IRU) welcomes the opportunity to provide comment on the second draft of the AQF Qualification Issuance Policy.

#### General comment

IRU supports the work of the AQFC in seeking to tighten regulation of compliance with the AQF.

It would be helpful to better understand the proposed timetable for implementation of the revised AQF and associated policies, such as the Issuance Policy. We also highlight that the transition to the new Issuance Policy will carry significant costs for institutions and urge the AQFC to raise this matter with government.

Our specific comments on the second draft Policy are provided below.

#### Definitions of key terms

In our view, the definitions of a *combined qualification* and a *double qualification* require further consideration:

- The definition for a *combined qualification* is too restrictive with its specification of 'consecutive AQF levels'. It precludes the possibility, for example, of combining a Masters in a field of previous study with a Diploma in a new, but complementary, field of study. Such a combination may be especially applicable to a dual sector institution and is consistent with the concept of a tertiary education sector.
- The use of the terms 'cotutelle' and 'multi-badged' within the definition of a *double qualification* is not appropriate. Cotutelle arrangements refer specifically to joint PhD programs between French and Australian institutions and hence are appropriate examples of a *joint qualification*. Similarly, 'multi-badged' programs typically result in a single qualification only.
- In the definition of a *double qualification*, it states that 'Double qualifications may be issued by one institution or by two institutions under a formal agreement', however, the policy states that a separate testamur is issued for each of the two qualifications (hence double qualifications are not issued *per se*).

### Protocols for issuing AQF qualifications

Higher education students are increasingly demanding flexibility in their programs of study, wishing to package subjects drawn from various accredited qualifications, according to their professional and personal interests. We are concerned that the draft Issuance Policy may leave some students with no formal recognition of their successfully completed subjects.

The Table below summarises our understanding of student eligibility for receiving an Academic Transcript or Statement of Attainment in a range of circumstances where they do not complete an AQF qualification.

Higher education student circumstances	Subjects completed have been separately accredited as a short course	Subjects completed have <u>not</u> been separately accredited as a short course
Student enrolls in an AQF qualification with the intention of completing it, but exits prior to completion, after successfully completing some subjects	Academic transcript  OR  Statement of attainment	Academic transcript
Student enrolls in an AQF qualification with the intention of only undertaking specific units of interest and exits prior to completion, after successfully completing some subjects	Academic transcript  OR  Statement of attainment	Academic transcript
Student enrolls in and completes a number of subjects drawn from different AQF qualifications in line with professional and personal interests.	Statement of attainment? (Would require clarification of the definition of an 'accredited short course')	No academic transcript or statement or attainment

It is the third category of student (ie those who choose to enrol in a number of subjects drawn from more than one AQF qualification program of study) which we are concerned could miss out under the current draft policy.

The definition of an 'accredited short course', either intentionally or unintentionally, suggests that the subjects within the short course need to be drawn from a single AQF accredited program. Institutions, however, may wish to package subjects from a range

of AQF accredited programs to meet a particular industry skill need. We suggest an alternative definition as follows:

*An **accredited short course** is a program of learning accredited by an accrediting authority that comprises two or more components (eg units of competency, modules or subjects) drawn from an accredited AQF program or programs.*

Students completing a package of subjects drawn from more than one AQF accredited program of study, which has not been accredited as a short course, will not be eligible to receive an academic transcript or a statement of attainment. IRU believes that provision for circumstances such as these should be made within the Issuance Policy.

#### Supporting documentation protocols

The draft Issuance Policy states that institutions may elect to provide graduates with an Australian Graduation Statement. The draft higher education provider registration standards recently released by the Department of Education, Employment and Workplace Relations, however, stipulate that all higher education providers must ensure that graduates receive a statement. Footnote 1 in the draft Issuance Policy suggests that the current voluntary basis for the issuing of statements will be overturned with a 'phased implementation period' to be defined.

It would be helpful for policy intentions to be made clearer and for there to be consistency across the policies being developed by different agencies. We suggest that the issue of 'ownership' of the Australian Graduation Statement (ie AQFC or DEEWR) will require consideration if the intention is to make it compulsory across all education and training sectors.

We look forward to consulting further with the AQFC in the development and implementation of the new AQF and associated policies.

Yours sincerely



Lenore Cooper  
Director