

## The draft Qualification Standards – IRU comments

The draft Qualification Standards are built of the revision of the Australian Qualification Framework (AQF) which Ministers endorsed earlier in 2011 following considerable discussion about the structure of the AQF and the nature of some qualifications in particular.

The IRU does not intend to re-open any of those discussions. We have four aspects of the draft Standards which we wish to comment on:

- the relationship to the AQF and its various documents;
- various points of wording where the draft is should be improved to convey its meaning more clearly;
- the coverage of awards that are not aligned to the AQF; and
- the requirements relating to the provision of credit between VET and HE qualifications.

### 1. The relationship to the AQF

The Qualification Standards are one of the threshold standards required of all higher education providers by the *Tertiary Education Quality and Standards Agency Act 2011*. The Standards will be made by the Commonwealth Minister. Ministers of the Commonwealth and States and Territories have recently endorsed the revised AQF which provides the underlying basis for the Standards.

The relationship of the two documents needs further elucidation to explore how future changes to the qualification arrangements will be worked through both. The preferred outcome is for a single process to lead to all necessary changes with the Standards being the lead framing document. In the longer term a more coherent set of documents should be possible.

The draft Standards repeat many provisions from the AQF, often with minor changes in wording, but also omit others of seemingly similar importance. The basis for selection, particularly in section 3, should be reviewed since it creates two similar but different sets of requirements. It would make much more sense to either repeat the AQF in full or for the Standards to require adherence to the relevant sections of the AQF. The occasional additional requirement should also be withdrawn (eg 3.8, see further below).

### 2. Points of clarity and precision

#### a. 'qualification' and 'award'

Throughout the draft Standards the term 'award' is used much more often than 'qualification' although there seems little to distinguish them. Since the guiding term through the name of the Standards as defined in the Act is 'qualification' it should be used. This would also be consistent with the AQF documents where 'award' is never used as an alternative for 'qualification'.

#### b. Relisting the qualifications

1.1.1 to 1.1.11 add nothing that is not already stated in the header paragraph of 1.1, which makes quite clear that the qualifications issued using AQF nomenclature are to be consistent with the AQF. If there is a question of the formal basis for the AQF as a matter for TEQSA regulation then the AQF itself should become part of the Standards, removing any confusion about there being Standards distinct from but essentially incorporating the AQF.

c. Restricting the use of ‘Doctoral Degree’

The wording of 1.1.12.2 suffers from the hangover of the intense debate about the use of the term ‘Doctor’ to describe any qualification other than a Doctoral Degree. A possible interpretation of the restriction as written is that it would be permissible “to identify or refer to” a qualification other than an AQF Masters Degree (Extended), for example an Advanced Diploma, as a Doctoral Degree – why else only make it an explicit restriction relating to the Masters (Extended)?

The provision would be better written as:

“The provider does not identify or refer to any qualification other than a Doctoral Degree [under 1.1.11] as a Doctoral Degree in any written, oral or electronic information provided to students in relevant certification documentation or any institutional promotional materials.”

d. Consistency of number

In section 3.2 ‘student’ is used in both plural and singular forms across dots 4, 5 and 7. The singular would be better to reflect that ultimately the decisions are made for each student based on general arrangements and the individual student’s needs and wishes.

### **3. Non AQF Awards (1.2 of the draft Standards)**

It is valuable for the Qualification Standards to recognise that higher education providers may also wish to issue other qualifications than those laid down in the AQF, although the AQF qualifications remain the prime set.

There are two purposes for such a provision.

First, it permits universities to offer short courses targeting specific knowledge sets or to upskill or enable students in preparation for enrolling in an AQF qualification. In some cases this study is not formally credentialed, in others it is. The provision allows for this.

Second, without the provision there is little opportunity for new qualification types to develop. Universities need the space in which to develop new qualifications to meet future needs, which if successful and attaining use by more than one or a few universities would then provide the basis for a new qualification could be conceptualised and developed through to inclusion on the AQF. Without such space it is hard to see how any new qualification, not currently in practice, could develop.

The standards should be more explicit about the nature of non AQF qualifications, to provide a greater context for their use.

It is also not clear why the provision relates to a qualification that is non AQF AND not able to be located against an AQF level since it is hard to see how any qualification could not be located against the levels, given they cover in steps a very wide range of educational provision. Further, if a niche appears that sits at a level, is distinct from the approved qualifications at that level, on what basis should a provider award not be created if otherwise such an award is possible?

### **4. Credit Transfer**

Section three is largely taken from the AQF Qualifications Pathways Policy, with some omissions and amendments.

The heading paragraph for section 3 sets up an unnecessary tension through use of ‘both’ to link the concept of “maximising the credit” and the need to ensure “the integrity of the learning outcomes or discipline requirements of the award”. As written it implies some conflict between the two, whereas

the integrity of the award has to be paramount with credit provided because the person has equivalent knowledge or skills. Hence the sentence would better read:

“These processes must be designed to ensure students are eligible to receive the maximum amount of credit which is consistent with preserving the integrity of the learning outcomes or discipline requirements of the qualification to which it applies”.

A related issue emerges at 3.5 which, as written, only considers the maximisation question and ignores the element of award integrity. This is because it picks up only 2.1.8 and not 2.1.4 of the AQF Pathways Policy. Hence the sentence would better read:

“Where the provider negotiates credit agreements with other providers for any qualification, it must set the credit available to eligible students for both entry into and credit towards the qualification at the highest level consistent with preserving the integrity of learning outcomes or discipline requirements of the qualification to which it applies.”

The requirement to maintain a register at 3.8 is an additional requirement to those specified in the AQF documents. The requirement to make relevant information public is already covered in 3.1 (based on 2.1.2 of the AQF) making 3.8 superfluous.

Further it is far from clear as to its requirements. If the register is read to mean a listing of each single arrangement possible, of which there will be hundreds if not thousands in most universities, it would be cumbersome to use. If it permits various ways to demonstrate the credit possible such as credit calculators then it would be feasible and indeed provided by universities now consistent with 3.1.