

## GRIFFITH UNIVERSITY

### *Strengthening the AQF: A Framework For Australia's Qualifications* RESPONSE TO AQF COUNCIL CONSULTATION PAPER – JULY 2010

Griffith University welcomes this opportunity to respond to the Australian Qualifications Framework Council's consultation paper *Strengthening the AQF: A Framework For Australia's Qualifications*. Griffith has already availed itself of the opportunity to respond to the May and September 2009 consultation papers released by the AQF Council. While recognising that the primary purpose of this consultation paper is to obtain advice about the transition and implementation issues for the higher education sector with the introduction of the strengthened AQF, Griffith University provides further commentary on the framework itself. Griffith University agrees to this response being published on the AQF website.

#### ***The Strengthened AQF***

The AQF needs to be strengthened to assure the quality of Australian education in light of the Government's widening participation target (40 per cent of the population aged 25-34 have degrees by 2020) and from 2012 a more 'student-demand driven system'. However, within this context the AQF needs to retain a level of flexibility within its structure to allow education providers to be responsive to the needs of industry and requirements of professional bodies, both nationally and internationally.

#### *Masters Degree Coursework*

The AQF has a number of constraining features such as its hierarchical structure, which the *Qualifications Pathways and Linkages* policy recognises is not necessarily the way students gain qualifications, acknowledging that multiple pathways are taken and that a qualification at a lower level may be undertaken in conjunction with or subsequent to one at higher level depending on whether:

- The qualification is providing deeper level, cumulative, sequential and specialist discipline knowledge, or
- The qualification is developing knowledge and skills in a new discipline or area of study broadening the skill base, possibly as professional preparation.

Universities commonly distinguish between qualifications of this type by their entry criterion. This is particularly pertinent at the masters degree level, where the AQF states there are two main forms of Masters degree - research and coursework. In practice many institutions offer two types of coursework masters, one postgraduate colloquially referred to as *masters advanced*, which normally requires for entry a bachelor degree in the field and thus extends extensive knowledge in the field and a coursework graduate masters, colloquially referred to as *masters entry*, which does not normally require a bachelor degree in the field and thus broadens the graduate's knowledge. It is also common practice for these different coursework masters to range in length from 1 to 2 years often in recognition of their purpose and entry criterion. The AQF Council appears cognisant of these issues with the more recent specification within the AQF of a '*notional duration of student learning*', on the basis of entry criterion, that the length of the masters be '*2 years following a 3 year Level 7 or 8 qualification or 1-2 years following a four year level 7 or 8 qualification.*' This level of specification constrains the masters qualification as well as removes an existing AQF pathway whereby applicants with no qualifications but relevant professional practice can enter and successfully complete a graduate certificate (0.5 in length), AQF Level 8, which is nested within a masters degree. There is a need for professional programs at the masters degree level to reflect a change of career or increased specialisation or to recognise professional practice attained within the workforce.

Within this context Griffith recommends reconsideration of the Master Degree (Coursework) to allow for:

- Masters (Professional preparation) – a Level 8 AQF qualification.
- Masters (Advanced) - a level 9 AQF qualification.
- Less prescription in entry criteria, as completion of a Graduate Certificate and Graduate Diploma, without an undergraduate degree would not allow entry to a masters degree, as is current practice.

### *Graduate Certificates*

The positioning of the Graduate Certificate as a Level 8 qualification type and the statement that 'they typically follow a level 6 or 7 qualification' ignores the current pathway of 'extensive relevant work experience demonstrating potential to undertake work at this level'. There are currently Graduate Certificates tailored to employees of organisations on the basis of work experience alone and as such these Graduate Certificates consolidate professional practice for the purpose of graduates undertaking further professional qualifications. As it is difficult to justify a 0.5 coursework qualification as being commensurate with the Bachelor Honours Degree which may be comprised predominantly of research, Griffith University's preference is for the Graduate Certificate to be recognised as comparable in terms of learning outcomes to a bachelor degree and located as a Level 7 qualification.

Griffith recommends the Graduate Certificate be a Level 7 AQF qualification.

### *Embedded Bachelor Honours Degree/End-on Bachelor Honours Degree*

The AQF as currently framed is silent on honours embedded within bachelors degrees and yet completions in Australia show that more honours are awarded on the basis of performance within a four year bachelors degree than through the end-on honours year. It is proposed that the Bachelor Honours as an AQF Level 8 qualification remain as described with one change in the notional duration of student learning – the removal of the following words '1 year following a 3 year Bachelor Degree' after 4 years.

Griffith recommends that the AQF Level 8 Bachelors Honours degree include both embedded and end-on Honours.

### *Doctoral Programs*

In the US doctoral programs are available for pre-service qualifications that prepare graduates for entry into particular professions, specifically in the area of health care. Doctoral degrees of this type tend to have a substantial amount of coursework, small research components and supervised professional practice components. Currently the Level 10 criteria and the Doctoral Degree qualification descriptors do not preclude the establishment of US entry level professional doctoral programs here in Australia, though the degree of discrimination in terms of learning outcomes between the Doctoral Degree (Research) and (Professional) is small.

### ***Transition and Implementation issues of which the AQF should be aware***

The proposed timetable for implementation of the strengthened AQF and associated policies is not stated within the consultation paper, though recent media reports suggest 2013. The AQF Council will need to set a period of time for existing qualification types which do not conform to the AQF to be phased out in line with standard maximum completion times for those awards so that students enrolled in programs are not disadvantaged. This is particularly important in relation to masters degrees that are currently one year in length after a three year bachelors degree, many of which are fee-paying postgraduate programs. It would be unfair for a student who has made the financial commitment for a one year fee-paying postgraduate award to find the cost doubled as a result of compliance with the AQF and then unable to complete the qualification receiving a Statement of Attainment rather than a testamur. Increasing the length of the masters award will also increase the costs for international students. Due to a range of factors Australia has recently experienced a slowing of its international student market, while one of the purposes of strengthening the AQF is to assure the quality of provision for international markets, if the cost of quality is too great other educational providers will meet the demand. Increasing the lengths of masters degrees that are the accepted entry-level qualification for a profession or where professional entry qualifications are only offered at that level, will also result in additional costs to the Commonwealth in its allocation of CGS load. The need to increase the length of existing masters to ensure compatibility with the AQF will impact on income from the following three sources - FFPOS, FPPG and CGS, requiring considerable revisions of universities' projected budgets.

A number of masters degrees offered by Australian universities are accredited by national, UK and US bodies. These accreditation processes are labour intensive and expensive, significant changes to the length of awards, altered content and revised admission requirements to comply with the AQF are likely to result in additional accreditation processes being required. Given these situations there may be some value in the AQF Council establishing transition advice about such awards both for institutions and accrediting bodies. By the end of 2010 marketing and promotion material for 2012 program offerings is being prepared, so clear decisions about the AQF in 2011 will be required to ensure all programs advertised as leading to awards are not inconsistent with the AQF.

In 1998 when the shift was made from the Register of Australian Tertiary Education (RATE) and other trade qualifications to the Australian Qualifications Framework (AQF) a transition arrangements document was released that addressed transition through program accreditation, a similar document needs to be included as part of the next consultation phase on the AQF.

Griffith recommends that the AQF publishes transition and implementation arrangements no later than 2011 consistent with the following:

1. Recognising for a period of time existing accredited programs before requiring conversion and reaccreditation.
2. Establishing a clear timeframe for completion of the program conversion and reaccreditation processes.
3. Ensuring the program conversion and reaccreditation process addresses the needs of graduates, continuing students, the professions, industry and the community.
4. Ensuring the program conversion and reaccreditation process is undertaken in a manner which ensures issues of equity and procedural fairness are served.
5. Ensuring resources are available for institutions converting qualifications for reaccreditation.

### **AQF Policies**

Griffith University understands that the intent of the AQF policies is to provide a high level framework of principles. The University would argue that in the main this intent has been achieved, however there are sections in each policy that are highly prescriptive and should be reconsidered. Detailed commentary on each policy follows:

#### **AQF Generic Skills Policy**

The relationship between the generic skills as set out in 2.2 and the learning outcomes for individual qualification types in terms of knowledge, skills and their application is not clear. For example, in terms of the bachelor degree it is hard to ascertain how the language, literacy, numeracy and ICT literacy skills are embedded in the learning outcomes. Similarly across all qualification type descriptors there is little in the learning outcomes specific 'to having a global perspective'. The AQF may be further enhanced if it addressed all three areas of Bloom's taxonomy of learning – knowledge, skills and attitude (affective behaviours) and thus increase alignment between the four broad categories of generic skills. The AQF specifications could be improved by identifying how the generic skills are embedded in knowledge, skills and their application for each qualification type.

As the AQF Council may be aware many higher education sector institutions have already articulated generic skills in the form of graduate attributes, one assumes that as a self-accrediting institution the existing Griffith Graduate Statement will meet the requirement in 2.3 that '*accrediting authorities will ensure generic skills are explicit in qualifications*'. More difficult to implement may be '*a generic skill will be commensurate with the level of qualification type and the field of study*.' An example here is the bachelor degree (AQF Level 7) and the bachelor degree with honours (AQF Level 8), different qualification levels, yet few discriminating factors to determine how the generic skills embedded in these learning outcomes may be different, especially as there is nothing to

preclude that a bachelors (pass) degree may include independent project work in the form of a capstone course.

|  | <b>Bachelor Degree</b>   | <b>Bachelor Honours Degree</b>   |
|--|--|--|
| <b>Application of knowledge &amp; skills</b> | Using judgement and initiative in professional practice and/or scholarship   | Exercising judgement and using initiative in professional practice and/or scholarship  |
|  | To adapt knowledge and skills in diverse contexts  | To apply and adapt knowledge and skills in a range of contexts, taking responsibility and accountability for own learning and professional practice and collaboration with others within broad parameters. |
|  | To take responsibility and accountability for own learning and professional practice and collaboration with others within broad parameters | To plan and execute project work and/or a piece of research and scholarship with some independence   |

The statement ‘a generic skill will be commensurate with the level of qualification type and the field of study’ provides the point at which the Teaching and Learning or Discipline Standards, currently being developed by the ALTC intersect with the AQF. In work undertaken to date in the discipline of accounting it appears the AQF qualification type descriptor ‘Application of knowledge and skills’ will be used as the basis for the discipline standard. It is interesting to note that in its most recent work (July 21, 2010) the discipline standards groups have interchangeably used words from the AQF Level 7 qualification Bachelors degree and the AQF Level 8 qualification Bachelors Honours degree:

| <b>AQF Descriptor</b>   | <b>Discipline Standard - Accounting</b>  |
|---|--|
| <b>Application of knowledge and skills</b>  |  |
| <b>Judgement</b>  |  |
| <i>Using judgement and initiative in professional practice and/or scholarship</i> | <b>Exercise judgement to solve routine accounting problems in a range of contexts including social, ethical, economic, regulatory and global perspectives.</b> |
| <b>Knowledge</b>  |  |
| <i>To adapt knowledge and skills in diverse contexts</i>                          | <b>Integrate theoretical and technical knowledge of accounting and other relevant areas</b>  |
| <b>Skills</b>   |  |
| <i>To adapt knowledge and skills in diverse contexts</i>                          | <b>Apply accounting knowledge and technical skills to routine accounting problems</b>  |

The last sentence in this policy implies that not only is a generic skill to be commensurate with a qualification type and field of study but also a sector – ‘graduates achieve the generic skills associated with their sector’. This statement appears anomalous given that the sectoral boundaries have been removed within the strengthened AQF. The AQF and the policy as it currently stands will not provide the assistance that qualification developers and accrediting authorities will require to apply the four broad categories of generic skills in ways that are commensurate with the level of qualification type and the field of study.

Griffith University in its May 2009 submission to the AQF indicated lack of support for embedding generic skills within the learning outcomes and given the lack of clarity as to how they fit, enhance or support the taxonomy the University continues to hold that view.

### **AQF Qualifications Issuance Policy**

The requirement in Section 2.1.1 that graduates are entitled to be issued with a full set of certification documentation on ‘award of the qualification’ is unclear; in part because the definition for ‘award’ in the draft *AQF Glossary of Terms* includes the phrase ‘and is eligible for certification,’

yet states that the term 'conferral' may also be used. A better definition for 'award' may be 'a graduate has met the requirements of the qualification and the qualification certified through the provision of a testamur.' Currently, at Griffith students are not entitled to receive their testamur until their conferral date which normally coincides with their graduation ceremony or in the case of Summer Semester, a conferral round not attached to a ceremony. The phrase 'award of the qualification' is ambiguous using the current definition of 'award' as it implies the University is required to issue the documentation once a student has met the requirements of the award and has been determined as 'eligible for certification' rather than graduates being issued with a full set of certification documentation at the time of conferral of the degree. Using the current definition of 'award' graduates may expect the University to issue graduation documentation at the time they are identified as 'eligible for certification', representing a major disruption of business processes and additional cost. It may be better to simply state: '*All graduates....are entitled to receive the following certification documentation:*' and not try to state when they are entitled to receive it as practices within institutions and across sectors are likely to vary significantly.

Griffith recommends the definition for 'award' be 'a graduate has met the requirements of the qualification and the qualification certified through the provision of a testamur'.

The requirement in Section 2.1.2 which is qualified in 2.1.3 could be changed as follows:

*Students who have completed some of the accredited units of an AQF qualification but as a set do not represent a full AQF qualification are entitled to receive:*

- *A Statement of Attainment which may be provided in the form of a record of results.*

In the higher education sector statements of attainment are not provided for incomplete qualifications, but a record of results are provided and used for RPL and credit. In Queensland the Senior Secondary Certificate for those that complete is a certificate/testamur and a record of results, for those who don't complete the certificate, a statement of attainment is received which is a record of results that are incomplete for the awarding of the certificate. In both the school and higher education sector in Queensland only one document is provided for students that have completed some of the requirements towards a qualification, and so as not to add to the costs and paperwork of either sector the revision above is proposed, enabling the deletion of sections 2.1.3 and 2.1.7.

Griffith recommends only one document is provided to students that have completed some of the requirements towards a qualification and that is a *Statement of Attainment* which may be provided in the form of a record of results.

In the light of qualifications undergoing conversion and reaccreditation to be consistent with the strengthened AQF, there may be other circumstances that could be included in Section 2.1.4. In the 1998 transition arrangements from RATE to the AQF the following provision was available to graduates '*Graduates wishing to convert that qualification to one under the framework may apply to do so through Recognition of Prior Learning;*' being one of the criteria for surrendering the earlier testamur. At Griffith surrender of testamurs is required in the following instances, neither of which are covered in 2.1.4, and both of which are to the graduates' advantage:

- The testamur is damaged and a replacement testamur is requested.
- The University Council has agreed to upgrade the award level of a program without changing the program's degree requirements.

While Griffith has included the AQF logo on its AHEGS, as required by DEEWR; requiring the inclusion of the following words '*the qualification certified herein is recognised within the Australian Qualifications Framework*' as specified in Section 2.1.6 and 'any subsequent AQF Logo' on transcripts and testamurs represent major changes. A major re-design of both of these documents would be required which is costly. The look and layout of the testamur is important to our graduates and at Griffith a new testamur was adopted due to substantial feedback from graduates. This is

where one of the transition principles is important ensuring the AQF's policies '*address the needs of graduates, continuing students, the professions, industry and the community*'. The AQF Council as part of its transition and implementation strategy will need to convince graduates that these additions add value and do not compete with the issuing institution's branding and reputation.

Griffith has recently implemented the Australian Higher Education Graduation Statement and there was no advice in the Guideline for the Presentation of Australian Higher Education Graduation Statement as per Section 2.3 that '*the Graduation Statement will be used to document any equivalencies with international qualifications*', consistency between this policy and the AHEGs requirements are important, otherwise graduates will have expectations that may be difficult to meet, especially given that the implementation of AHEGs has taken considerable and costly system development.

Section 2.3 also introduces the notion of the 'combined qualification' indicating that one award is conferred on the basis of a combination of two qualifications at the same AQF level or at two different AQF levels. The definition of the combined degree is of concern as it requires the graduate to only 'satisfy the minimum requirements of one and not both component qualifications.' While the issuance policy is prescriptive about the abbreviations for a combined degree, in terms of the lower qualification being listed first and the higher thereafter, it does not state that the minimum requirements of the degree that needs to be satisfied is the higher one. Where these qualifications are of different types, such as the Bachelor/Graduate Diploma combination Griffith's preference is for the requirements of both qualifications to be completed. Griffith is unclear about the market for the combined degree where the '*minimum requirements*' of one qualification provides you with two qualification types on the one testamur.

Griffith recommends the AQF adopts the following definitions:

*Combined qualification*

*'A combined qualification is awarded when a graduate has completed the requirements of two AQF qualifications at different levels. A separate testamur is issued for each qualification completed.'*

*Double qualification*

*'A double qualification is awarded when the requirements of two AQF qualifications of the same type have been completed concurrently. A separate testamur is issued for each qualification completed.'*

This allows for overlapping of complementary content and elective components of both qualifications and the award of double Bachelor and double Master degrees.

The value of 2.3.1 and 2.3.2 to the policy is questionable, given that by footnote 6 the AQF indicates it is a matter of institutional policy as is the case of honorary awards. Section 2.3 from the top of page 48 could be reduced substantially, if not deleted.

### **AQF Qualification Pathways and Linkages Policy**

The policy is based on the *AQF National Policy and Guidelines on Credit Arrangements* and also findings from a *Pathways Project* report commissioned by the AQF Council. The purpose of the policy is to maximise the credit that can be gained for learning already undertaken. The policy builds into the AQF the capacity to support lifelong learning in a way that reflects student movement over a lifetime.

Griffith University contributed to the consultation process for the project *Developing and Implementing a Common Terminology for Credit Transfer and Articulation* and *AQF National Policy and Guidelines on Credit Arrangements*. The current policy was made available in May 2009 by the AQF Council for **voluntary** use by institutions.

This new draft policy mainly reflects outcomes from past consultation processes. However, in pursuing the stated purpose to maximise credit between AQF qualifications the use of “**will**” in Sections 2.1 and 2.2 makes it mandatory for institutions to award specific amounts of credit, for types of and levels, as stated in this policy. This is an important and significant difference to past policy (see 1.6 *Linkages AQF National Policy and Guidelines on Credit Arrangements*). Institutions have not been consulted, until now, of the intention to use “**will**” in AQF policy regarding the award of credit.

It should be noted that this use of “will” in Sections 2.1 and 2.2 is contradictory to Section 1.2 *Scope* of the policy which states that *This policy and guidelines should not impinge upon or replace the academic integrity of qualifications or the autonomy and responsibility of individual education.....institutions in making decision on.....credit granted in their programs of study.*

Another mandatory inclusion (2.1 second dot point) in this current draft, which Griffith University would not wish to support, is the automatic recognition of learning *regardless of how, when and where it was acquired*. Such decisions can only be determined on a case by case basis as standards achieved through other than formal study must be comparable to the standards in the course of study for which credit is sought.

Generally, Griffith University supports the purpose, scope and the use of common definitions in this draft *AQF Qualifications Pathways and Linkages Policy*. However, in accordance with the draft policy’s own scope, Griffith cannot support the now mandatory aspects of 2.1 and 2.2 i.e. the University **will** recognise specific types, levels and amounts of credit towards its degree programs. This does not comply with the principles of Griffith University’s Credit Transfer Policy which states *The University will maintain the integrity of its academic programs and protect the academic standards and reputation of its awards. Credit for prior learning will be granted only within the constraints of this principle and where program structures and requirements permit.*

Griffith University suggests that “**will**” be deleted from Sections 2.1 and 2.2 of this draft policy and replaced with wording which more accurately reflects that such decisions will vary from institution to institution based on both the changing nature and content of VET qualifications and the differences in content and structure of University bachelor programs. Consequently, any AQF credit policy can only identify broad guidelines which are acceptable as agreed relativities between different AQF qualifications and encourage institutions to use these guidelines as a minimum base for determining credit.

### **AQF Register Policy**

Currently the AQF Council provides a web link to Griffith’s home page as the University’s entry on the AQF Register, from there the public access our programs and courses website. The University supports continuation of this approach and assumes this approach is consistent with 2.2 of the policy ‘*The AQF Council is responsible for providing a web-based portal for entry to any register that is part of the AQF register*’.

### **Addition or Removal of AQF Qualification Types Policy**

Removal of AQF qualification types seems inconsistent with the AQF’s intention to verify the bona fides of qualifications through a national record system, the AQF Register. In the transition from RATE to the AQF in 1998 the following qualifications were no longer recorded – the Advanced Certificate which at the time was deemed equivalent to a Certificate III (AQF Level 3), Certificate IV (AQF Level 4), and a Diploma (AQF Level 5), and the Associate Diploma equivalent to a Certificate IV (AQF Level 4), a Diploma (AQF Level 5), and an Advanced Diploma (AQF Level 6). In the current framework there is no attempt to align past qualification types with the new level criteria. A concept of inactive qualification types rather than removal may be a better practice.

Griffith recommends that qualification types be made ‘inactive’ or described as ‘not in use’ rather than withdrawing them from the Framework.

### ***AQF Glossary of Terminology***

As highlighted earlier Griffith University recommends changes to the definitions of 'Award', 'Combined qualification' and 'Double qualification', in addition the definition for 'Components of a qualification' has been repeated for 'Completion of a qualification.' Is there a discrepancy between the definition of a 'specialised qualification' as 'one of short duration' when only Level 9 AQF qualifications 'have specialized knowledge', that is the masters level and the notional duration is between 1 and 4 years?

### ***Comprehensive Policies***

As indicated earlier Griffith University is unsure of the value the addition of the Generic Skills Policy brings to the AQF, as well as some greater prescription in existing policies. The following policies without the Generic Skills Policy are comprehensive and adequate to support the *Framework*

1. AQF qualifications issuance policy
2. AQF qualifications pathways and linkages policy
3. AQF register policy
4. Addition or removal of qualification types policy (new)
5. Glossary of AQF terminology (new)

### ***Other policy aspects that should be considered***

Complementary to the above policies are the AHEGS requirements and its establishment as a separate document or its inclusion in the AQF Qualifications Issuance Policy is worth consideration.

### ***AQF Qualification Type Specifications***

There appears to be inconsistencies between descriptors used in the AQF Levels criteria and those used for the AQF qualification type descriptors, for example Level 8 includes **advanced** knowledge and Level 9 **specialised** knowledge, yet when you look at the level 8 qualification type descriptors:

- Bachelors Honours Degrees – coherent and **advanced** knowledge;
- Graduate Certificate – **Specialised** knowledge (perhaps because of its short duration? – see AQF Glossary of Terminology);
- Graduate Diploma – **Advanced** knowledge;

one uses the Level 9 descriptor, yet both the Level 9 qualification types – Masters Degree (Research) and Masters Degree (Coursework) use the Level 8 descriptor – '**advanced** body of knowledge.'

### ***Transition Arrangements***

Griffith University welcomes the opportunity for consultation on the arrangements the AQF Council proposes to put in place to implement the AQF and the transition through program accreditation arrangements for those qualifications that are not consistent with the AQF.