

16 April 2013

Higher Education Standards Panel Executive
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Dear Dr Heywood

Response to Higher Education Standards Panel Consultation Draft Standards for Course Design and for Learning Outcomes – Discussion Paper

Thank you for the opportunity to comment on the Higher Education Standards Panel's proposed approach to the revision of the *Higher Education Standards Framework*. The following comments reflect both the AQF Council's initial consideration of the Higher Education Standards Panel's proposal and its views on the quality assurance of AQF qualifications which culminated in the release of the *Australian Qualifications Framework First Edition July 2011* and subsequent *Second Edition January 2013*.

The AQF Council is concerned that the AQF is diminished in both the Higher Education Standards Panel's proposed organising framework and by the proposal to make the AQF a reference point in the relevant standards. This has the potential to undermine the significant progress in strengthening qualification outcomes made in recent years through the revisions to the AQF and the implementation of national quality assurance arrangements.

It is also inconsistent with the determination of the Standing Council on Tertiary Education Skills and Employment (SCOTESE) and the Standing Council on School Education and Early Childhood (SCSEEC) on the AQF. In 2011, the predecessors of SCOTESE and SCSEEC, building on the decisions of earlier ministerial councils, reaffirmed that the AQF provides the standards for qualification outcomes for all Australian qualifications in higher education, vocational education and training and schools. In addition, they reaffirmed that the AQF underpins the achievement of a number of national policy objectives related to national economic performance, qualification pathways and the national and international mobility of graduates.

Qualifications are fundamental to the long standing policy environment which connects education and the labour market through qualifications. The underpinnings of a qualifications-based labour market requires qualifications to be reliable indicators of the levels of knowledge, skills and application of knowledge and skills for individuals, industry, professions, societal institutions and governments. Reliability of qualifications currently is established through compliance with qualifications standards. The credibility of higher education qualifications, which supplies a large proportion of the labour market, is compromised without robust standards for qualification outcomes. Furthermore, the global mobility of students and the workers holding either AQF qualifications or foreign

qualifications that are compared with AQF qualifications is significant and reliant on quality assured AQF qualifications.

The achievement of these national objectives is contingent upon the application of the AQF, through its inclusion in enforceable provider and qualifications standards, in all education sectors. With the inclusion of the AQF in the current *Higher Education Standards Framework*, Australia has achieved this. The result is that the Australian education system with its national qualifications framework and national quality assurance arrangements is a world leader.

The Higher Education Standards Panel's proposed organising framework for the higher education standards indicates that the *Standards for Course Design (Coursework)* and *Standards for Learning Outcomes (Coursework)* – encompassing the scope of some of the current *Course Accreditation Standards* – are intended to supersede the current *Qualification Standards*. If this is the case, the proposed standards do not allow for adequate quality assurance of AQF qualifications in the higher education sector. The quality assurance of AQF qualifications requires the inclusion of the AQF in standards for both course design (and accreditation) and for the delivery and assessment of the learning outcomes that led to the award of a qualification.

The proposed *Standards for Course Design (Coursework)* and *Standards for Learning Outcomes (Coursework)* diminish the AQF by specifying that it is to become a reference point. According to the definition of reference points, their use '...is seen as a mechanism that gives some guidance to providers and regulators while not being prescriptive ...' This is reinforced in the proposed *Standards* which state that course design and learning outcomes will only be informed by the AQF. The AQF Council is concerned about this significant shift from mandating the use of the AQF for quality assuring AQF qualifications as is currently the case with the *Higher Education Standards Framework*.

Of further concern to the AQF Council is that the important functions of delivering, assessing and issuing quality assured AQF qualifications is not adequately incorporated into the proposed organising framework for the higher education standards. The provider focus of the proposed framework overlooks the importance of AQF qualifications as the currency of the labour market (for example, they are used almost exclusively for registration to practice for the professions), that funding of universities is for AQF qualifications and that financial support for students is on the basis of AQF qualifications. The proposed framework does not adequately situate the higher education standards in the national policy context of higher education which demands greater transparency of qualification outcomes and accountability for the provision of qualifications.

In summary, the AQF Council considers that the AQF must remain as a mandated part in the *Higher Education Standards Framework* to provide enforceable quality assurance arrangements for AQF qualifications delivered, assessed and issued in the higher education sector. This may be achieved through refinement of the proposed two standards to include the AQF as a requirement and through including the AQF as a requirement in the other relevant standards contemplated by the Higher Education Standards Panel.

The AQF Council looks forward to ongoing discussion with the Higher Education Standards Panel on the review of the standards for higher education.

Please do not hesitate to contact me regarding this response on [or](#)

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Yours sincerely

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