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Council of Australian Postgraduate Associations

**Discussion Paper on the
Australian Qualifications
Framework Advisory Board
Review of
AQF Guidelines for the
Bachelors Degree and
Postgraduate Qualifications**

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Executive Summary

From CAPA's perspective the core problem to be address by *The Review of AQF Guidelines For the Bachelor Degree and Postgraduate Qualifications* are deficiencies in the current Australian Qualifications Framework (AQF) standards for Higher Degrees. However, it is also clear that some of the deficiencies in the regulation of educational awards flow not from the AQF, but from the lack of a coherent national regulatory system. Both need to be addressed urgently.

CAPA has identified the following problems with the current AQF:

- ❑ entry to coursework Masters is set at the three year Bachelor(pass) level and not the standard for other Higher Degrees which is the four year Bachelor with Honours level;
- ❑ a full year of what is effectively a qualifying year can be counted as part of the Masters by coursework and, as a consequence, the duration of the Masters by coursework may be too short by one year;
- ❑ the research Masters is too short in duration by at least one year, being one year instead of two; and
- ❑ the PhD is too short in duration by at least one year, being three years instead of four.

Research conducted by CAPA and the AQF shows that some of these deficiencies are the legacy of past standards that have been incorporated into the AQF without review. Accurate standards are now essential because the marketisation of postgraduate coursework has created significant pressure on providers and accrediting bodies to lower course standards. In the case of research Degrees, pressure from government to reduce the funding periods has also highlighted deficiencies with the current AQF.

CAPA recommends the creation of a separate AQF level for the Bachelor Degree Honours to clarify the entry pathways to Higher Degrees and substantial amendment to the AQF guidelines for the Masters Degree and the Doctorate. In the case of the Masters, both coursework and research awards should have the same entry standard and be of similar duration (two years). In the case of the Doctorate, it is recommended that the duration be increased to four years and that an additional description of the Professional Doctorate be included in the guidelines.

The entry of Vocational Education and Training (VET) providers into the postgraduate coursework arena has called into question the relevance of generic AQF standards for both VET and university courses. The nexus between teaching and research is particularly relevant to postgraduate courses and needs to be maintained. Furthermore, the move to competency based training in VET and inflexibility from VET and universities on articulation has created an excessive barrier between the two sub-sectors of higher education.

CAPA recommends the following response to these issues:

- ❑ the creation of separate descriptors in the AQF where VET and university awards overlap;
- ❑ the rationalisation of authority to provide awards so that overlap is minimised; and
- ❑ multi-jurisdictional legislation to guarantee smooth articulation between VET and universities.

The AQF currently lacks the authority to ensure its standards are observed in all jurisdictions and by all accrediting bodies. The newly created Australian Universities Quality Agency (AUQA) and *National Protocol for the Recognition of Universities, the Accreditation of Courses Offered by Non-University Providers, and the Operations of Higher Education Providers in Australia* will not be effective unless this fundamental problem is addressed. Accordingly, CAPA recommends the creation of a single multi-jurisdictional accreditation body underpinned by template legislation in all jurisdictions.

The legislative underpinning of Australian awards needs to address international as well as national issues. One suggestion for doing this is the creation of a system of licensing for higher education providers. Furthermore, students need to be able to easily check on the status of both the provider and the award(s) being offered. In response to this situation CAPA is calling for a feasibility study of the licensing concept and for the creation of a single register of the AQF status of all accredited courses in Australia.

It is also apparent that national guidelines on courses can not be divorced from the critical issue of funding. Funding in turn can not be addressed without a clear guide to the length of courses. Thus, CAPA recommends the specification of course length for all levels of the AQF. Furthermore, these durations need to accurately reflect both the normative length of courses and proper educational standards.

A number of CAPA's recommendations are lengthy and are not repeated in full in this summary. They are however listed in the table of contents. CAPA is seeking feedback on all aspects of this document. Full contact details and a timetable for the review process are listed in the following section.

The Review

On 10 April 2000 the AQF Advisory Board (AQFAB) wrote to CAPA advising of *the Review of AQF Guidelines for the Bachelor Degree and Postgraduate Qualifications*. The review is considering Bachelor, Masters and Doctoral Degrees and the Graduate Certificate and Graduate Diploma. 'Review of the Graduate Certificate and Graduate Diploma qualifications will also involve revision of the guidelines to include competency-based VET-sector programs with equivalent outcomes'. It is focusing on 'any necessary revision to the AQF qualifications and guidelines involving Bachelor Degree level and beyond, to reflect the changing needs and interests of the sectors over the next five years'.

The terms of reference for the review are:

- ❑ The issue of the relationship between Masters, Graduate Diploma and Honours Bachelor, to ensure that the guidelines covering these qualifications are sufficiently robust to support the integrity of each qualification;
- ❑ The titling of the qualifications, to ensure that nomenclature is readily comprehensible and reflects the needs of users, which may involve adoption of subsidiary titles if these are widely used and can be consistently defined;
- ❑ The clarity of the guidelines for each qualification, to ensure that they clearly describe the various pathways, variation in duration and the diversity of programs to be accommodated, including competency-based programs;
- ❑ To identify needs related to issuing qualifications outside the AQF, for analysis against the AQF criteria for inclusion, to ensure the AQF is able to meet all needs for national recognition; and
- ❑ To identify pressures, including international ones, on qualifications and their implications for the future of the AQF as a support structure for qualifications in the coming decade.

With this discussion document CAPA is seeking to refine its views on the issues to be addressed in the review and to place the AQF in the context of an evolving environment for the regulation of higher education. CAPA's experience in the monitoring of the deregulated environment in postgraduate coursework education is both unique and highly pertinent to these considerations.

Stages and Timing of the AQFAB Review

Stage Number	Description	Timing
One	Survey of universities and State and Territory accrediting authorities.	Completed
Two	ANTA to report on adapting Grad Cert and Grad Dip for Competency Based Training.	In progress
Three	Draft descriptors produced and discussion paper produced based on stages 1 & 2.	Circulation expected in November to be followed by consultation.
Four	Draft guidelines considered by AQFAB; Submission to MCEETYA	Possibly late 2000

In its consultations to date CAPA has identified a range of issues. These are listed in appendix one. Most are dealt with in this document however some fall beyond its scope. Feedback received on any aspect of this discussion document will inform CAPA's final submission to AQFAB. This will occur after AQFAB produces its discussion document (see timetable above).

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1 Problems With AQF Masters and PhD Guidelines

On 29 January 1998 the Council of Australian Postgraduate Associations (CAPA) made a submission to the Senate Inquiry into the Appropriate Roles of Institutes of Technical and Further Education. In that submission CAPA noted that:

With the advance of full fee-paying in the postgraduate coursework area, universities have succumbed to the temptation to classify more courses as postgraduate and to apply the term 'Masters Degree' to an array of courses of varying length. Thus a Masters Degree can range from anywhere between two years of full-time research to less than one-year full time equivalent. Postgraduate courses often contain units from undergraduate courses that have been repackaged. A confusing array of sub Higher Degree postgraduate courses has also mushroomed. Some of these articulate into Higher Degrees and some seem to have only tangential value either as a stand-alone award or as a component of another award.

In such an environment it is not possible for the student to compare apples with apples when choosing a course. Postgraduate alumni also have concerns over the devaluing of their own awards, as courses with the same name but of lesser duration, quality and entry requirements flood the employment market.

(CAPA 1998, pp 3-4).

In 1998 CAPA investigated the Australian Qualifications Framework (AQF) standards for the Masters Degree and the PhD and found a number of problems with them. A constructive dialogue ensued between CAPA and the AQFAB secretariat on this issue. CAPA has identified the following concerns:

- ❑ entry to coursework Masters is set at the three year Bachelor(pass) level and not the standard for other Higher Degrees, which is the four year Bachelor with Honours level;
- ❑ that a full year of what is effectively a qualifying year can be counted as part of the Masters by coursework and, as a consequence, the duration of the Masters by coursework may be too short by one year;
- ❑ the research Masters is too short in duration by at least one year, being one year instead of two; and
- ❑ the PhD is too short in duration by at least one year, being three years instead of four.

2 AQF Masters and PhD Standards Reflect Deficiencies in Previous National Standards

The Australian Qualifications Framework (AQF 1996, 1998) supersedes guidelines for the various Australian post-compulsory academic awards contained in its predecessors, the Register of Australian Tertiary Education (RATE) and the Australian Council of Tertiary Awards (ACTA).

The guidelines for the Masters and Doctorate awards have, for many years, failed to reflect actual funding periods and normal course duration. Thus, ACTA (1986) and AQF (1998) give the 'normal' duration of Doctorates as three years when actual average completion times and funding periods significantly exceed this. Similarly, the Masters by Research was and is currently funded for three years, not one year as in AQF (1998).

ACTA guidelines were designed to ensure that qualifications in the former Colleges of Advanced Education (CAEs) were comparable with universities. The ACTA (1986) guidelines for Masters Degree by thesis state:

Because each candidature is individual and specific, the Council would not wish to be unduly prescriptive about the duration of study. The Council considers that two (2) years might be a normal time for completion of a Master's Degree by thesis but would accept that the minimum time for completion could be one calendar year from the date of registration. The Degree would be awarded in this time only if there were exceptional circumstances relating to the candidate's academic and/or professional background (ACTA 1986, p. 10).

This is clearly a *minimum* rather than a typical or average duration. It also appears to show that the shift in national guidelines for research Masters, mediated by the NBEET work on course length in 1989–1990 (NBEET 1989, 1990), is a shift from a *minimum* (ACTA) to an *implied nominal* duration. The NBEET (1990) final report recommends 'a Research Masters at one calendar year ... following a four-year first Degree' (p. 13). This NBEET position is simply replicated in the subsequent RATE and AQF guidelines, neither of which bodies carried out their own specific research on course length.¹

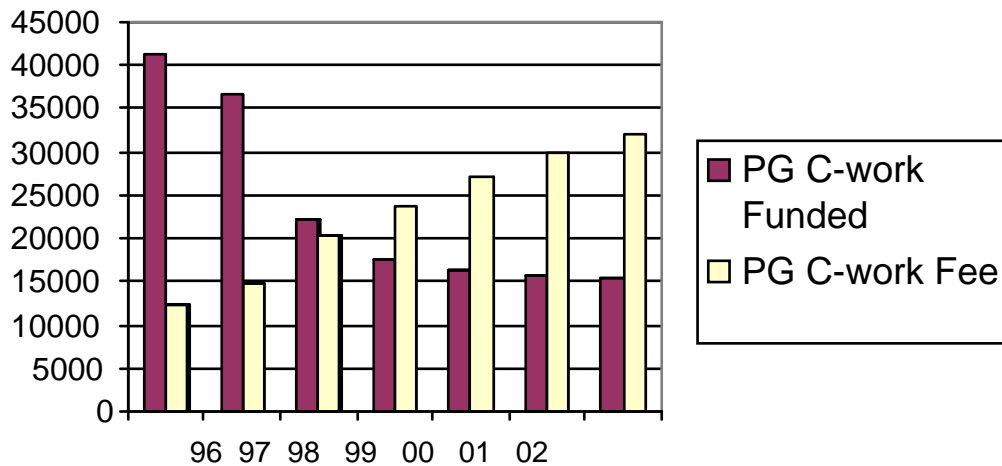
The history of course duration for the Masters by coursework appears to follow the pattern set in research with the added complication of coursework Masters taking in a one year preparatory phase in most versions of the standards. Thus, in effect, both the coursework and the research Masters appear to coalesce around the one year duration post four year Honours or equivalent.

While duration and entry standards for Higher Degrees Research have continued to exceed the inadequate guidelines in AQF and its predecessors, this is not the case with the Masters by Coursework. This is attributable to the market pressures unleashed in this area following the cutting of 25,000 funded postgraduate coursework EFTSU (see table

one). In practice, course duration for the coursework Masters now appears to be arbitrary with a number of courses failing to meet even the current AQF guidelines. For example, Monash University advertise a 2 year full time equivalent (FTE) Masters of Business, a 1 year (FTE) Masters of Business (International Business) and a 6 month (FTE) Masters of Marketing.² Analysis of postgraduate guides suggests that programs of this short duration at the Higher Degree level have become prevalent across the sector. This is particularly the case where they are embedded in a nested structure that gives full or significant credit in the Masters for study in lower level postgraduate programs.³

Table One
Domestic Postgraduate Coursework Places Fee-paying and Funded 1996 – 2002
(EFTSU)⁴

	1996	1997	1998	1999	2000	2001	2002
PG C-work Funded	41315	36727	22286	17572	16400	15833	15292
PG C-work Fee-paying	12365	14908	20366	23869	27027	29892	32112
Total	53680	51635	42652	41441	43427	45725	47404



CAPA believes the way to deal with these collective shortcomings with the current AQF is via the following amendments to the AQF.

Recommendation 1. Creation of a “Bachelor Degree Honours” Guideline

It is recommended that a new guideline for the “Bachelor Degree Honours” be included in the AQF. This guideline should include the following criteria:

- ❑ Entry to the Bachelor Degree Honours is via a high level of achievement in Bachelor Degree study.
- ❑ The Bachelor Degree with Honours is at least four years of university study. This is normally composed of a three-year Bachelor Degree and an additional Honours Degree. In Bachelor Degree programs of longer than three years duration Honours candidates may, upon satisfactory performance, be admitted to a designated Honours stream within the structure of the existing Bachelor program.
- ❑ Where entry to the Honours program is via successful completion of a three year Bachelor Degree the entry standard will be at least a credit average in the relevant discipline. Entry to Honours is competitive and may require ranking of candidates. Other equivalents need to meet or exceed this standard.

Recommendation 2. Amend the AQF Masters Degree Guideline

It is recommended that the Masters Degree Guideline in the *Australian Qualifications Framework Implementation Handbook, Second Edition 1998* (p. 55–56) are amended in the following manner.

3.2 Characteristics

Amend to read.

The Masters Degree, like the Doctoral Degree, is a Higher Degree and has a similarly high entry standard. The Masters can be taken by coursework only, research only, or by a combination of the two. A research Degree may contain up to one-third coursework. [Coursework may include project-based work related to professional practice.] Characteristics of the learning outcomes at this level include the enhancement of specific professional or vocational skills and/or the acquisition of in-depth understanding in a specific area of knowledge.

Reasons for amendment

Given the complexities of the different types of Masters Degrees – Coursework, Research, Academic, Vocational – and the overlap between these categories, a much fuller explanation than is currently given is required.

4. Responsibility for Assessment

Add the following:

Assessment practices need to comply with those guidelines established by the relevant jurisdictions and the Australian Universities Quality Agency. In the case of Higher Degrees by research this includes a requirement by the Commonwealth that at least one examiner is external. Appropriate rigour will be applied consistently to all phases of the assessment process. This includes:

- ❑ *assessment, including recognition of prior learning, for the purposes of ensuring that the appropriate entry level for the course has been achieved;*
- ❑ *assessment, including recognition of prior learning, for the purposes of advanced standing in the course;*
- ❑ *assessment which determines progress through any course units offered by the provider; and*
- ❑ *assessment which determines the final level of achievement in the course.*

5. Pathways to Qualification

The following amended wording is recommended:

Candidates typically hold a Bachelor Degree with Honours (with at least Second Class Honours) in an area of study relevant to the intended field of further study or one of the following equivalents:

- ❑ *a Masters Preliminary year of study (H2 A/Distinction average); or*
- ❑ *a Graduate Diploma with high grades (H2 A/Distinction average) where high grades have also been demonstrated at the undergraduate level (at least credit average or equivalent); or*
- ❑ *a Graduate Diploma⁵ with relevant professional experience; or*
- ❑ *relevant professional experience including research experience where applicable; or*
- ❑ *a combination of qualification and professional experience.*

Candidates are expected to demonstrate potential to undertake study at the Masters level. In no case should a candidate with an aptitude below that of Bachelor with Honours, Second Class Honours level be admitted to study at the Masters level. Thus, assessment of equivalence under other entry methods need to be rigorous and well documented and should detail how the candidate has met the equivalent with Degree with Honours entry. In order to facilitate the candidate applying for scholarships, a statement of equivalence specifying the level of Honours the intending student is deemed to hold should be issued.

A typical Masters Degree would be expected to require the equivalent of two years full-time study at the Masters level. Previous study credited to other awards does not count as study towards the Masters level. However, advanced standing may be provided for relevant experience and/or study that has not been otherwise accredited.

Reasons for amendment

The current standard is seriously flawed in three areas.

1. By providing for entry from the three-year Degree level directly to the Masters it allows study at less than Higher Degree level to form part of the Masters Degree. Study at this level would be properly classified as Honours, Masters Preliminary, or Graduate Diploma. Amending the guideline as suggested would allow for a clear articulation between the guideline for the Graduate Diploma and the Masters qualifications.
2. The length of candidature given for a research Masters is too short. Average adjusted actual completion time for the Master by research is over three years full-time equivalent. DETYA, which is far from generous in these matters, grants two years of scholarship to Masters by research candidates. The White Paper provides for two years funded tuition including HECS exemption.
3. The current Masters Degree guideline arbitrarily distinguishes between Masters by Research and Masters by Coursework. The level of attainment for a qualification should not be determined by factors such as the method used to teach a course. Accordingly, CAPA can see no valid reason for the Masters Degree to have two lengths. The guideline currently provides for a two year Masters Degree by coursework. A logical duration for the Masters by Research is two years.

6. Authority to Issue the Qualification

This section should state clearly who is accredited within Australia to issue the qualification by reference to a national register of all accredited providers (see Recommendation 7). Accordingly, this section should be amended to include the following:

Only bodies recognised under the National Protocol for Higher Education Approval Processes as appropriate to issue the qualification of Masters have the authority to issue the qualification. All courses, their AQF status and the authority under which the course award is issued are listed in the register (to be created).

Reasons for amendment

See section 5 of this document.

Recommendation 3. Amend the AQF Doctoral Degree Guideline

It is recommended that the Doctoral Degree Guideline in the *Australian Qualifications Framework Implementation Handbook, Second Edition 1998* (p. 57–58) be amended in the following manner.

3.2 Characteristics

Amend to read:

The Doctoral Degree is a Higher Degree (like the Masters Degree). As such it has a high entry standard with entry often subject to competition and ranking of students. The Doctoral Degree is normally undertaken by research. A research Degree may contain up to one-third coursework.

At this level, undertaking of a research project will include:

- *a searching review of relevant sources;*
- *experimentation or other systematic approach to the relevant body of knowledge;*
- *the undertaking of an original research project resulting in a significant contribution to knowledge and understanding;*
- *a comprehensive record of the research and related activities demonstrating the relationship between the research and the broader framework of the field of study. This will normally include a well ordered thesis. Other materials may also form part of what is assessed. These may include:*
 - *electronic creations such as virtual environments and web sites;*
 - *artistic creations including performances, designs, paintings, scripts, musical scores, film and video; and*
 - *scientific creations such as circuit diagrams and experimental equipment.*

In some instances the entire medium for materials to be assessed may also vary from the conventional book. For example, submission of a web site rather than a conventional dissertation in book form.

The Professional Doctorate

The Professional Doctorate is a high level qualification tailored to the requirements of a specific vocation. As such, it should be distinguished from the research based PhD by its title. The title of a 'Professional Doctorate' should either include reference to the relevant professional field and/or the words Professional Doctorate.

Characteristics of the learning outcomes at this level include the acquisition of in-depth understanding in a specific area of knowledge and enhancement of specific professional or vocational skills. These will be of the same searching and expansive quality as the research Doctorate but may be obtained via a range of activities. Examples of these are research related to a specific professional context, coursework involving high level interaction with other professionals in the same field and project work related to the candidate's field of employment and/or a combination of these.

Reasons for amendment

Given the complexities of the Doctoral Degree, a much fuller explanation than is currently given is required.

4. Responsibility for Assessment

It is recommended that the following be added to this section:

Assessment practices need to comply with those guidelines established by the relevant jurisdictions and the Australian Universities' Quality Agency. In the case of Higher Degrees by research this includes a requirement by the Commonwealth that at least one examiner is external. Appropriate rigour will be applied consistently to all phases of the assessment process. This includes:

- *assessment for the purposes of ensuring that the appropriate entry level for the course has been achieved including recognition of prior learning;*
- *assessment, including recognition of prior learning, for the purposes of advanced standing in the course;*
- *assessment which determines progress through any course units offered by the provider; and*
- *the final level of achievement in the course.*

5. Pathways to Qualification

The following amended wording is recommended:

Candidates typically hold a Bachelor Degree with Honours with at least Second Class Honours in an area of study relevant to the intended field of further study or one of the following equivalents:

- ❑ *a Masters Preliminary year of study (H2 A/Distinction average); or*
- ❑ *a Graduate Diploma with high grades (H2 A/Distinction average) where high grades have also been demonstrated at the undergraduate level (at least credit average or equivalent); or*
- ❑ *a Graduate Diploma⁶ with relevant professional experience; or*
- ❑ *relevant professional experience including research experience where applicable; or*
- ❑ *a combination of qualification and professional experience; or*
- ❑ *a Masters Degree; or*
- ❑ *progress toward a research Masters Degree.*

Candidates are expected to demonstrate potential to undertake study at the Doctoral level. In no case should a candidate with an aptitude below that of Bachelor with Honours (minimum Second Class Honours) be admitted to study at the Doctoral level. Thus, assessment of equivalence under other entry methods needs to be rigorous and well documented and should detail how the candidate has met the Degree with Honours equivalent (minimum 2A level). In order to facilitate the candidate being ranked for entry to a place or when applying for scholarship, a statement of equivalence specifying the level of Honours the intending student is deemed to hold should be issued.

A typical Doctoral Degree would be expected to require the equivalent of four years full-time study at the Doctoral level. Previous study accredited to other awards does not count as study towards the Doctoral level. However, students in a Masters by research program may in some circumstances convert to Doctorate by research where they have

not yet taken out the Masters Degree. In this case only one qualification will be awarded.

Reasons for amendment

Duration is a crucial element of the standard. It indicates the level and complexity of the work. The main difference between a research Masters and PhD is the complexity of the project. This complexity is a result of the difference in scale of the project related to the two awards. Thus, if a PhD is twice the word length of a Masters it is not the same process as writing two Masters theses but a much more complex and difficult one.

6. Authority to Issue the Qualification

This section should state clearly who is accredited within Australia to issue the qualification, by reference to a national register of all accredited providers (see recommendation 7). Accordingly, the section should be amended to include the following:

Only bodies recognised under the National Protocol for Higher Education Approval Processes as appropriate to issue the qualification of Doctorate have the authority to issue the qualification. All courses, their AQF status and the authority under which the course award is issued are listed in the register (to be created).

Reasons for amendment

See section 5 of this document.

3 The AQF is unclear about the relationship between the university and the VET sectors

The AQF conflates university awards and VET awards. However, significant qualitative differences exist between VET and University awards. This is illustrated by comparison between the Advanced Diploma (VET) and the Degree (university) in table two.

Table Two Comparison of the Attributes of University and VET Awards

Attribute	The Advanced Diploma (VET)	The Degree (university)
Sector	Is an extension of the VET system	Is the core award of the university system
Method of Learning and Assessment	Is competency based and geared to assessment of competencies as demonstrated in the workplace.	Is based on an academic curriculum and is meritocratic – ranks according to academic results – in the grades award for each unit of study
Entry Level	Entry is primarily via successful completion of lower level VET qualifications (pass/fail assessment) and related work experience.	Entry is primarily via meritocratic ranking of students based on past academic results.
Duration	The AQF standards for VET competencies do not directly express times requirements for formal tuition for each award level, although for the Advanced Diploma an equivalent with university education is expressed.	Satisfactory progress through three or more years (full time equivalent) of study.

The first is essentially a VET qualification which the AQF says is the equivalent of ‘three years full-time study [at university] after the completion of a Senior Secondary Certificate of Education’ (AQF 1998, p. 47). The Bachelor Degree is essentially a university qualification. Entry is on ‘satisfactory completion of Year 12 in an Australian School system’ and ‘a typical Bachelor Degree program would be expected to require the equivalent of three years full-time study’ (AQF 1998, p. 50).

In practice, university entry is highly competitive. Most students are ranked according to entry scores calculated by State and Territory authorities based on marks achieved at the exit level of secondary (school) education. A minority have access to special entry

mechanisms. VET awards and university qualifications do not then lead to the same type of outcomes, nor are they intended to (see table two). However, considerable overlap exists between the awards that can be provided by VET and universities (see table three).

Table Three: Awards defined as higher education by the AQF by Type of Provider

Type of Award	Offered by Universities (Self Accrediting Institutions)	Offered by VET (Non-Self Accrediting Institutions)
Doctoral Degree		
Masters Degree		
Graduate Diploma		
Graduate Certificate		
Bachelor Degree		VET Bachelors Degrees are not in the AQF but are offered in some jurisdictions.
Advanced Diploma		
Diploma		

This overlap is dealt with in a reasoned manner in the AQF with the dual structure of the Advanced Diploma and the Degree. Given this dual structure at the Degree/Diploma level it is not clear why VET also need to provide Degrees as is now the case in some jurisdictions, for example the ACT, but not yet in the AQF. Similarly, we might well ask why universities need to be in the business of providing Advanced Diplomas? What then, is the difference between a university Advanced Diploma, a VET Advanced Diploma, a university Degree and VET Degree? Why do we need four qualifications at the same level? This is a muddled situation that can not help but be confusing to students, employers, funding agencies and providers.

The situation becomes perhaps more muddled at the postgraduate level where, with a recent decision by the AQFAB to acknowledge VET at the postgraduate level. Reform of the Masters guidelines necessitates reform of all the guidelines from Advanced Diploma

onwards and the clear distinction of VET and University pathways. Such clear distinction is necessary if a reliable recognition of prior learning processes is to be established for students who need to move between the VET and the university sectors.

Only by doing this can students, employers, funding bodies and all those with an interest in the education and training system have a clear guide to the purpose and intention of courses and be able to asses their value and relevance.

As it stands, the AQF is not likely to be a clear guide to appropriate course design and content for each award level. For example, what does it mean for a university Higher Degree to be made up of VET components from providers who are otherwise delivering sub-Degree programs? This points to the need for much greater clarity in the standards applicable to various sectors, particularly in a 'for profit' environment. These issues are by no means confined to the relationship between VET and universities as universities

have already acted to 'contract out' the provision of university programs to a range of non-university providers.

Recommendation 4. Clear Demarcation of VET and University Awards

- University and VET pathways should be clearly and separately identified in the AQF.
- Where VET and university awards overlap in level they should have separate nomenclature.
- Universities should only provide awards at Degree level and above.
- VET should only provide awards up to and including Advanced Diploma level.
- VET should not provide Degrees or postgraduate Degrees.

Recommendation 5. Articulation Between VET and Universities

That the new multi-jurisdictional body (see recommendation 6) act to establish a binding process to resolve the issue of articulation between VET and universities (in either direction). In the absence of such a body Ministers in all jurisdictions should act immediately to establish a task force to resolve this issue. Such action should include the withholding of Commonwealth, State and Territory funds from providers who fail to comply with a rational and fair system of articulation. Such a system should specify binding recognition of prior learning proportions for students articulating between VET and university providers.

4 A New Regulatory Regime

Australian Governments have recently introduced two new, external quality control measures the Australian Universities Quality Agency (AQUA) and the *National Protocol for the Recognition of Universities, the Accreditation of Courses Offered by Non-University Providers, and the Operations of Overseas Higher Education Providers in Australia* (The National Protocol),

The Ministerial Council for Employment, Education, Training and Youth Affairs (MCEETYA) produced the National Protocol to deal with:

- ❑ Criteria and processes for recognition of Australian Universities;
 - ❑ Operation of overseas higher education institutions in Australia;
 - ❑ Accreditation of higher education courses to be offered by non-self accrediting institutions;
 - ❑ Delivery arrangements for higher education institutions involving other organisations;
 - ❑ Endorsement of courses for overseas students.
- (MCEETYA 2000b, 1.7).

The Protocol (MCEETYA 2000b) refers to the AQF where it states that:

- ❑ an institution which meets agreed national criteria, and is authorised under legislation, will be listed on the AQF register of bodies which are authorised to issue qualifications (2.23);
- ❑ the awards covered by higher education legislation and processes should be those defined as higher education in the AQF (4.9); and
- ❑ the course design and content should satisfy the requirements set in the Australian Qualifications Framework for the award level (4.22).

However, the AQF and the Protocol can not provide a fully effective **national** standard for the measurement of the adequacy of educational awards in universities and VET. This problem is acknowledged in the Protocol, which states at 4.4 that:

The awards protected under the relevant legislation differ from jurisdiction to jurisdiction, and there is no common position on what awards should be protected... Some award levels including Diploma, Graduate Certificate and Graduate Diploma may be accredited under both higher education and vocational education legislation. This lack of uniformity in award titles protected, and agreement on what constitutes higher education, causes some difficulties in cross-jurisdictional accreditation processes. (MCEETYA 2000b, 4.4).

In effect the States, Territories and the Commonwealth are currently free to ignore the AQF. Thus the Commonwealth admitted the Norfolk Island based Greenwich University to the status of university without it being entered onto the 'register of AQF bodies which are authorised to issue qualifications'.⁷ To do so now may now contravene The Protocol. However, it is yet to be seen how the Greenwich issue will be resolved and this precedent will bear on the future operations of The Protocol.⁸

The States and Territories also often ignore the AQF. These jurisdictions have the legal power to grant self-accrediting status to universities or to otherwise accredit courses. The AQF has proved to be no guarantee of consistency between the States and Territories and the example of the Masters is again pertinent. For example, the AQF was amended to accommodate the issuance of postgraduate qualifications by VET providers. Yet the States and Territories are divided on the validity of this practice. Some States will accredit VET postgraduate courses (eg. SA, Vic and NSW), while others will not (eg Qld).

Furthermore, as already indicated considerable variation exists between the standards applied to the Masters Degrees by universities. At the very least, this raises a question about the regime of compliance to AQF standards by self-accrediting institutions. The States and Territories have been willing to allow self-accrediting institutions to be 'innovative' in course length and description. For example, the micro duration Masters noted above.

Variation between jurisdictions and between self-accrediting providers may well encourage Australian and international providers with the laxest standards to seek accreditation in the jurisdiction most likely to accredit them. In a competitive market,

this process will undermine jurisdictions and institutions that seek to set more rigorous standards. This is particularly so where the sphere of the provider's operations extend beyond the borders of a State or Territory jurisdiction. Universities and other higher education providers now operate extensively in national and international education markets via distance delivery and a variety of other arrangements.

The Australian Universities Quality Agency (AUQA), announced by Minister Kemp in December 1999, may address some of these issues. As described in its Constitution, the AUQA is a company jointly owned by the States, Territories and Commonwealth. The objectives of AUQA are:

- ❑ to arrange and manage a system of periodic audits of quality assurance arrangements relating to the activities of Australian Universities, other Self Accrediting Institutions and State and Territory higher education accreditation bodies;
- ❑ to monitor, review, analyse and provide public reports on quality assurance arrangements in self accrediting institutions on processes and producers of State and Territory accreditation authorities, and on the impact of those processes on the quality of programs;
- ❑ to report on the criteria for the accreditation of new universities and non-university higher education courses as a result of information obtained during the audit of institutions and State and Territory accreditation processes; and
- ❑ to report on the relative standards of the Australian higher education system and its quality assurance processes, including their international standing, as a result of information obtained during the audit process.

(MCEETYA 2000a, 1.5).

If the AUQA observes the Protocol this leaves the AQF the role of setting the standards for Australia's higher education academic awards. However, the AQFAB can not enforce national standards on the States and Territories. In effect, this leaves the accrediting bodies to set essential benchmarks by which they are then to be assessed by the AUQA.

This vicious circle, must be addressed if the quality of postgraduate coursework and Australian education awards in general, are to be maintained. Therefore, if the AUQA is to meet its objectives, particularly 3 and 4, the agency will need to have access to a processes whereby States, Territories and institutions must comply with a nationally agreed qualifications framework and these standards must be set according to objective criteria.

This would necessitate the jurisdictions establishing a process where they agree to abide by standards established by an external body. This body should be jointly controlled by the jurisdictions. This could be achieved by giving the AQF and the AUQA sufficient legislative underpinning and funding. Such a structure need not be more expensive than the current multiplicity of State, Territory, Commonwealth and national coordinating bodies and should be more efficient and effective in its operations.

Recommendation 6. Establishment of a Single Multi-Jurisdictional Accreditation Body

The establishment by the Commonwealth, States and Territories of an external body to set and monitor standards for higher education. This body will be jointly controlled by the jurisdictions, however its decisions will be binding on all jurisdictions. The new body should take in and enhance the activities of existing bodies such as the AQF by providing adequate, legislative underpinning and funding. A priority for the new body should be compliance with nationally agreed standards.

Student bodies including CAPA and those representing undergraduate students and VET students should be represented on this body. As an interim measure CAPA should be included on the AQFAB.

5 Recognition and Regulation in the Context of a Global Market for Corporate Education and Training

Higher education is currently provided in the context of an international market for higher education and post initial entry education and training. In recent years this has been marked by two developments.

1. The international provision of higher education, including the:
 - entry of overseas providers into the domestic Australian market; and
 - export of education by Australian providers.
2. Commercial provision of university education and post initial entry education and training by:
 - fully commercial entities; and
 - government funded institutions operating on a fee for service basis.

These developments raise a number of issues relevant to the immediate and longer term future of the regulation of higher education in Australia. One of these is the need to comply with obligations under international agreements such as the World Trade Organisation General Agreement on Trade in Services.

Cunningham (2000, p. 142) puts forward a model for the regulation of providers in Australia which would be consistent with these international obligations. Such compliance is critical to protect Australian higher education exports from international sanctions. This model also has the potential to ensure greater clarity for Australian students seeking to purchase or otherwise gain entry to courses in the continuing

education market. Currently in Australia, postgraduate courses are a sizeable portion of this market.

Cunningham (2000) suggests a three tier system for licensing providers. The three tiers and their attributes are summarised in table four. Licensing of providers would give students a clear indication of the level to which the provider of their course had sought and gained accreditation in Australia.

Table Four Three Tier Model for Licensing Higher Education Providers⁹

Level	Attribute
1. Minimum Quality	For qualifications to be recognised in Australia, but where the provider does not seek recognition in Australian as a higher education institution. This would cover: <ul style="list-style-type: none"> ❑ people who have studied overseas seeking to have qualifications recognised in Australia; ❑ Australians who study overseas or acquire a Degree through cross-boarder supply through the Internet or other distance provision; or ❑ programs delivered by corporate universities or similar bodies who do not seek formal accreditation as higher education institutions.
2. Intermediate	For designated teaching institutions whose award programs meet quality assurance requirements set by governments, agencies and/or professional organisations but do not seek entry to level three.
3. University	Level three institutions would need to demonstrate a standard equal to or exceeding that currently expected of Australian universities recognised under State and Territory Acts of Parliament in areas such as: <ul style="list-style-type: none"> ❑ library resources; ❑ percentage of full-time staff; ❑ research activity; and ❑ range of programs.

Licensing will not be useful to students seeking information on a course unless they can easily ascertain both the AQF level and the licensing status of its provider. Currently the AQF only keeps a list of self accrediting institutions and accrediting bodies. Students, potential students and all other interested parties need to be able to easily check that a course is offered by a provider which is accredited (and licensed) to award that qualification at the AQF level specified.

Accordingly, an expansion of the register currently kept by the AQFAB to include all accredited courses is required. This would involve close integration between the administration of the Protocol, the AQFAB and Australian Universities Quality Agency and the assistance of the AVCC (who collects data on courses provided by universities). Overseas providers who have received Australian accreditation should also be listed. Even if licensing is not introduced, such a national register of accredited courses should be established immediately (obviously without reference to licensing status).

Recommendation 7. Creation of a National Register of Accredited Courses

A national register of all courses accredited under State, Territory and Commonwealth jurisdiction should be created. The register should state clearly:

- the AQF level of the course;
- under which jurisdiction it or its provider is accredited;
- if the course is a VET, university or other course; and
- if the provider is a VET institution, a university or other category.

Such a register should be easily accessible to all intending students.

Recommendation 8. Investigation of Licensing of Providers

A review to investigate the feasibility of a three tier provider licensing system that will differentiate between universities, teaching only institutions, and those seeking minimal recognition should be funded by the Commonwealth, States and Territories. The review should consult broadly with all interested parties and the public, and report to all Australian parliaments via MCEETYA.

6 Course Length and Funding

Course length as prescribed (or not prescribed) in the AQF has the potential to significantly affect funding arrangements for courses. Other decisions, such as allowing dual coverage of VET and universities also has implications for funding. Amount in hours or years of formal tuition, while not prescribed in the AQF for VET qualifications, is prescribed in processes relating to ANTA. As we move further toward a regime of national and international competition in higher education, pressure on the AQF and its successors to specify course duration will intensify.

That such specification is imperative is illustrated by the problems in the market for postgraduate coursework programs, particularly Masters Degrees. Here, in the majority of cases, the student is expected to pay full up-front fees for the course. In such a situation academic standards become increasingly difficult to measure (let alone police) as

the unit of measurement is repeatedly fudged. It is also of note that VET providers are now entering the postgraduate coursework market, as is a range of overseas providers. It is then, imperative that effective and realistic national standards for course length be introduced.

Recommendation 9. Specification of Course Length in the AQF

All levels of the AQF should specify the appropriate duration of the award as a full-time study equivalent. This should reflect funding practice and appropriate educational standards. Where an award requires a specified level of supervised workplace training or experience this should be specified separately.

Appendix One – Issues

The following issues relating to the Review have been identified from consultation and research undertaken by CAPA.

1. Entry to and outcomes from VET and Universities are not the same:
 - Do they require separate descriptors where award levels overlap?
 - Does a need exist for a dual system of VET and University awards?
 - Up to what level should this overlap go?
 - What implications does this have for the funding of education and training by States and Territories, the Commonwealth, students, and employers?
 - Does this overlap assist or hinder the process of RPL where a student needs to articulate for from VET to university or the reverse?
2. How to resolve the confusion in Pathways between VET Competency Based Training and university education in current AQF descriptors.
3. The pressure created by a decline in public funding on course providers and accrediting bodies to accredit courses of a lower standard because they are fee-paying.
4. Should the AQF reflect variances from each jurisdiction?
5. Process for resolving conflict between funding bodies, an independent quality and accreditation agency, and other players.
6. Role of student representatives, alumni and consumer bodies in the setting of standards.
7. VET training time requirements are reflected in ANTA processes but not the AQF. What are the implications of this for transparency, consistency and funding decisions?
8. How to ensure integrity for RPL processes? For example this is more lax for entry to fee-paying courses and difficult (or expensive) for advanced standing in fee-paying courses. It also varies in high and low demand courses.
9. What is the demand for VET postgraduate qualifications from industry, unions, providers or students?
10. What do these groups think they are getting out of these qualifications?
11. Do VET qualifications need to be fixed to equivalences in the university sector?

12. If a need does exist for VET postgraduate qualifications, should they articulate with the Advanced Diploma or the VET Degree? Given such a need is demonstrated, who should fund these courses?

13. The market for continuing education is expanding rapidly and increasingly involves a range of providers on a global scale. Entry into this market by universities has blurred the distinction between their role as providers of Degree level and above courses with an emphasis on research and providers of in-service training or other life-long learning. This issue is acute at the postgraduate coursework level. Which courses should be:
- accredited with nationally agreed awards for VET?;
 - accredited with nationally agreed awards for universities?;
 - seen as discrete elements of in-service training or other non-award professional development?; or
 - personal development courses?.
14. The expanding continuing education market is driven in part by the contracting out of on-the-job training by employers. As this training is provided on a fee for service basis, depending on who pays (or should pay) for this service, it may also represent cost shifting from:
- employer to the student;
 - government to student;
 - the Commonwealth to the States; or
 - the States to the Commonwealth.
15. The Postgraduate Diploma has largely lost currency. However, the Australian Psychological Society requires it for entry to the profession of psychology. Is it worth having a Postgraduate Diploma and Graduate Certificate defined in the AQF?

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Endnotes

¹ Information on the early ACTA guidelines and its precursors was kindly provided by Judith Forsyth of AQFAB and has been paraphrased in this section.

² This Degree is advertised as a one semester (0.5 year) program in *The Good Universities Guide: Postgraduate and Career Upgrade 2000* (Ashenden and Milligan 1999, p. 183) and the *AVCC Postgraduate Directory* (AVCC & GCCA, 1999; p. 119). In the *AVCC Postgraduate Directory* the prerequisite for this course is stated as "an Honours Degree (at credit average or better) in the discipline or the G Dip in Marketing or an equivalent qualification" (p. 119). This information is contradicted by Monash University, which states that 'the Masters of Marketing comprises 12 subjects and ... requires 1.5 years of full time study post an undergraduate Degree for its completion, rather than 6 months' (Russell 2000).

According to Monash University's 2000 Handbook, students who have satisfactorily completed the Graduate Diploma in Marketing can gain credit for up to six subjects in the Masters. This conflates a 4th year equivalent with up to half of the Masters course. This is a significant gloss, as up to half of this Higher Degree course is not conducted at a Higher Degree level. Furthermore, it is not clear whether entry into the Masters via the Graduate Diploma is at a level of 'an Honours (at credit average or better)'.

This practice is not confined to Monash University. All universities have 'nested' programs by which Graduate Certificates and Graduate Diplomas articulate (with credit) into Masters programs. Indeed, Monash University has stricter guidelines than most universities by not permitting credit from Graduate Diplomas to exceed more than 50% of the Masters. Other institutions with a similar course structure are effectively offering 6 months (EFT) Masters programs if they accept full credit for the Graduate Diploma.

³ On these issues see Smith and Frankland 2000. 'Marketisation and the New Quality Agenda: Postgraduate Coursework at the Crossroads', *Australian Universities Review* forthcoming.

⁴ 1998 to 2002 figures are DETYA data corresponding to Figure V2. 1, page 111 of the *Higher Education Report for the 2000 to 2002 Triennium*. Figures for 1997 are based on data supplied by DETYA on projected load reductions, the *Higher Education Funding Report for the 97-99 Triennium* and *Selected Higher Education Student Statistics 1997*. Figures for 1996 are based on data supplied by DETYA on projected load reductions, the *Higher Education Funding Report for the 96-98 Triennium* and *Selected Higher Education Student Statistics 1996*.

⁵ In some instances a 'Postgraduate Diploma' that extends a specified undergraduate set of skills is required.

⁶ In some instances a 'Postgraduate Diploma' that extends a specified undergraduate set of skills is required.

⁷ Norfolk Island is an Australian external territory and thus comes under Commonwealth jurisdiction.

⁸ See Ben Hills, 'Click here for your PhD', *Sydney Morning Herald* 29 June 2000.

⁹ Source, Cunningham et al 1990 *The Business of Borderless Education*, p. 142.