Dear Mr Dawkins,

As noted in the University of Sydney’s earlier submissions to the AQF Council’s Strengthening the AQF project, we support the renewal of the framework for the benefits it will bring in synchronising and aligning different educational sectors, and in providing clarity to students, employers, governments and the public.

We believe the focus on learning outcomes provides a useful discipline for thinking about qualification levels, which will assist institutions to articulate outcomes and standards for individual awards. Similarly, we welcome the emphasis on generic skills and the requirement that they be made explicit in qualification documentation. A stronger, more coherent framework, will benefit students by facilitating flexibility, international comparison and portability. Within the university sector, a clearer framework will assist disciplines to develop programs, and academic boards to approve and assure their quality.

The University of Sydney welcomes the response in the July 2010 consultation paper to feedback on earlier drafts, particularly in the Issuance Policy and in the specifications for master’s programs. The change in the Issuance Policy to allow issuing organisations to decide whether the AQF logo will appear on their Testamurs or Graduation Statements is a welcome response to the concerns that have been raised by many providers about institutional autonomy. The proposed specifications for master’s degrees better reflect Australian and international practice than the previous proposal, by separating coursework and research degrees, while the extension of the notional duration of study up to a possible four years makes due allowance for the growth of graduate-entry professional programs.

We also note the draft policy on the addition and removal of qualification types and support the aim to balance flexibility and innovation with stability.

In relation to the current draft framework, the University of Sydney makes the following comments.

Credit

The University supports the principles of the Pathways and Linkages Policy which, it believes, will benefit students, remove barriers to participation and increase flexibility. However, it is important to strike a balance between maximising appropriate credit, and ensuring that courses deliver stated outcomes while meeting the standards of institutions and accrediting bodies. Before an institution can grant credit for prior learning it has a responsibility to be...
satisfied that the body that provided the prior learning delivered on appropriate learning outcomes. In some professional areas this is not always the case across the sector at present. We believe that the automatic granting of credit for level 4, 5, and 6 qualifications is not always appropriate for all level 7 qualifications. For example, under the proposed credit requirements, a student with any TAFE diploma would receive a full semester’s credit (10% of course load) in the University of Sydney's five-year Bachelor of Veterinary Science. This could compromise the University’s ability to ensure the stated outcomes at the appropriate standard. In engineering, based on an assessment of different levels of rigour operating in different institutions, our current practice awards more credit to some overseas diplomas than local TAFE qualifications.

We therefore welcome the statement on the autonomy and responsibility of individual institutions under 1.2, and suggest that the wording in 2.2, specifying base levels of credit be amended slightly by inserting the word “appropriate” in the headings of 2.2.1 and 2.2.2 (“Appropriate Qualifications in the same discipline”, “Appropriate Qualifications in a different discipline”). A general disclaimer stating that the awarding of credit should occur where doing so is compatible with the achievement of stated outcomes and standards may also be desirable.

**Honours**

We welcome the inclusion of the Honours degree at level 8 as a research pathway. Honours qualifications are used throughout the sector for entry to research degrees at levels 9 and 10 and in the awarding of postgraduate research awards. Greater clarity should enhance international recognition and portability. Honours programs should be a minimum of four years and either be appended to a three year program, or integrated into a four-year program, but must contain a specific research and research training element that prepares students of the right ability for entry into level 9 or 10 research qualifications. Honours degrees should not be awarded solely in recognition of merit. We suggest consideration of a slight rewording for Honours along the following lines:

**‘NOTIONAL DURATION OF STUDENT LEARNING**

4 years (1 year following a 3 year Bachelor Degree, or integrated within a 4 year bachelor degree program with a specific research element)

**Breadth and Depth in Level 8 Qualifications**

Graduate Diplomas currently fulfil the function of both adding greater depth, leading to more advanced knowledge in a discipline, and greater breadth through the study of disciplines not studied in the qualifying level 7 award, leading to higher level synthesis, but not to more advanced knowledge. While we believe it is the intention of the descriptors to capture this, the current wording under Knowledge and Skills puts greater emphasis on advanced knowledge than synthesis. We suggest consideration of a slight rewording for the Graduate Diploma along the following lines:

**‘KNOWLEDGE**

Advanced knowledge or high level synthesis of knowledge within a systematic and coherent body of knowledge that may include the acquisition and application of knowledge and skills in a new or existing discipline or professional area.’

**Qualification Titles**

We support the use of the Graduation Statement as the appropriate vehicle for detailing the student’s learning experience and for explaining the alignment of the qualification with the AQF levels and with equivalent international qualifications. However, the degree of specificity proposed for titles, abbreviations and postnominals in the Issuance Policy is unnecessarily restrictive and would require substantial changes to professionally-accredited degrees such as our internationally recognised Juris Doctor, our Doctor of Clinical Dentistry and Doctor of Clinical Surgery. We therefore recommend that the final draft provide issuing organisations, particularly self-accrediting institutions, with greater flexibility than is proposed in the use of
titles to accommodate established disciplinary convention, responsiveness and consistency with accepted international practice.

**Level 10 Doctoral qualifications**

We note that the current descriptor proposed for level 10 qualifications makes reference to communication skills to “present a complex investigation or original research for external examination against international standards and to communicate results to peers and the community,” and that the Go8 has suggested that this be strengthened along the lines of a statement indicating that students are “assessed externally against international standards and produce an output with a high level of originality and quality”. We support the emphasis on the high level of originality and quality in the Go8 submission.

As noted above, the University of Sydney sees much of value to domestic and international students, employers, educational institutions and governments in moving to a learning outcomes-based framework for post school education qualifications. Nevertheless, we note that the terms of reference for the Strengthening the AQF project included “providing advice on strategically strengthening the AQF to improve its national consistency, contemporary relevance and the national and international portability of qualifications”. We question whether beyond achieving consistency, the proposed restrictions on qualification titles contained in the draft Issuance Policy will do anything to improve the contemporary relevance and internationally portability of Australian university qualifications. Indeed, the failure to accommodate qualification types that are currently offered by many Australian universities specifically to ensure international recognition and portability, is likely to have serious implications for the international competitiveness, reputation and financial health of some disciplines.

We are currently engaged in discussions internally and externally with the Go8 and Universities Australia about key aspects of the proposed reforms and understand that both groups will provide input on behalf of their members. We believe that a revised package of reforms, which addresses issues such as those we have raised above, and which critically, provides Australian universities with a reasonable degree of flexibility over the naming of their awards, is likely to receive strong endorsement from the sector.

We would be grateful for the opportunity to review and comment on a final draft of the Strengthening the AQF package before it goes to the Ministerial Council for Tertiary Education and Employment for endorsement.

Yours sincerely

(Signature removed for electronic circulation)

Michael Spence