Dear Ms Schofield,

Thank you for the opportunity to provide feedback on the draft TEQSA Qualifications Standards released for comment on 6 September 2011. In the time provided for written comments we have been unable to consult widely within the University about the content of the draft. Nevertheless, we provide the following initial comments, noting that the legislation requires the TEQSA Standards Panel to review the first set of Qualifications Standards within a year of the Panel's establishment.

**Preamble and subsections 1.2 on pages 2 and 4.** We are pleased that the draft recognises explicitly that some higher education providers will continue to have the authority to offer non-AQF qualifications under the new national regulatory framework. We are concerned, however, by the potential implications of the statements in the draft Preamble, and in subsection 1.2 on page 2 of the draft, that providers offering non-AQF awards must, in addition to complying with the Qualification Standards and the Provider Course Accreditation Standards, meet additional explicit criteria to be set by TEQSA.

We are comfortable with all of our teaching and learning activities being assessed by the TEQSA against the Course Accreditation Standards. We would be very concerned, however, if TEQSA were to set additional criteria for non-AQF awards outside of the Qualifications Standards, that had the effect of restricting in any way our capacity to deliver educational courses in the manner that we decide is educationally sound. We suggest therefore that the Preamble and subsection 1.2 on page 2 should be amended to make it clear that universities may offer non-AQF awards provided that they do so in compliance with section 1.2 of Qualification Standards (page 4).

**Subsection 1.1.12.1.** We note that the reference in the AQF Issuance Policy to the method by which further exceptions may be permitted has not been included in the draft Qualification Standards. We suggest that this subsection would benefit from adding a third dot point which confirms that additional exceptions may be added in accordance with the AQF Qualification Type Addition and Removal Policy.

**Subsections 2.2.1 & 2.2.6.** We welcome the confirmation in subsection 2.2.1 that providers will have the option of making reference to an award being recognised by the AQF either on the testamur or graduation statement, with flexibility also provided about usage of the AQF logo. We note however that the fifth dot point in subsection 2.2.6 could be read as requiring the inclusion of an authorised AQF logo on the graduation statement. We feel that this subsection would benefit from amendment to remove any ambiguity. We also suggest that the subsection would benefit from the inclusion of words to the effect that the Graduation...
Statement may also include any other information considered necessary by the provider in order to assist a potential employer, or higher education provider offering further study, to understand the particular attributes of the course and the learning outcomes achieved by the graduate.

**Subsection 3.1.** While we do not read this clause as prohibiting alternative entry schemes for students from disadvantaged groups, such schemes have an important place in ensuring social equity. We feel that potential ambiguity would be removed if the subsection was amended to make it plain that providers may have special entry programs that are not open to all students, but which are designed achieve defined social inclusion objectives.

**Subsection 3.2.** There are contradictions in the third dot point of this subsection (‘regardless of when it was acquired’ but also ‘provided that it is relevant and current’). The wording places pressure on institutions to accept prior learning on the grounds of relevance, currency, and the presence of a relationship with the learning outcomes of its award. If providers are to be able to guarantee the learning outcomes of their graduates they should not be required to provide credit for prior learning unless they have determined that the standard of learning was appropriate. We therefore suggest that the third dot point of subsection 3.2 should be amended to read: ‘recognises prior learning regardless of how, when and where it was acquired provided that the prior learning is relevant, verifiable, current, and has an appropriate relationship to the learning outcomes of the award.’

**Subsection 3.4.** We note that the wording of this subsection is considerably stronger than the equivalent clause (2.1.6) in the AQF Qualifications Pathways Policy. We suggest that the subsection should be amended to ensure consistency between the Standards and the AQF. Such edits would make it clear in the Qualification Standards that it is for providers to determine as they see fit the extent to which a potential student’s informal learning has prepared him or her for admission, or for a grant of advanced standing.

**Subsection 3.6.** We welcome the inclusion of this clause which recognises to some degree the importance of ensuring that providers remain responsible for determining the comparability and equivalence of studies completed at other institutions for the purposes of credit transfer and articulation. We question, however, why subsection 2.1.4 of the AQF Qualifications Pathways Policy has not also been included in the draft Qualifications Standard. It is important that the Qualifications Standards also stress that, in the interests of maintaining the integrity of qualification outcomes, responsibility for decisions about admissions and the granting of credit rests with the issuing organisation.

I trust that these comments assist the department to refine the Qualification Standards in advance of consideration by the Minister and subsequently by the first TEQSA Standards Panel.

Yours sincerely

[Signature removed for electronic distribution]

Michael Spence