

30 April 2010

Ann Doolette
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Dear Ann

I appreciate the opportunity to provide a response to the second draft of the AQF Issuance Policy. The Group of Eight (Go8) supports measures that assure graduates and employers, both domestic and international, of the quality of Australian qualifications. Any changes to the current assurance mechanisms need to be balanced and resist a "one-size-fits-all" approach. The tertiary education sector is becoming increasingly differentiated to meet the needs of a broader student body and a more complex labour market, and education policy settings should reflect this reality.

Firstly, I want to express how dissatisfied our member universities have been with the consultation process to date. In particular, the fact that previous submissions, from them and other stakeholders, have not been made public to allow for open discourse on these important issues compromises the process. The piecemeal approach taken to releasing the various AQF policies and frameworks, furthermore, has produced considerable confusion and a lack of transparency.

The Go8, as well as our individual member universities, wrote to you in November 2009 expressing a number of substantive concerns with the initial draft of the AQF Issuance Policy. Our major concerns have not been addressed and yet your 22 March covering letter introducing the latest round of the consultations states '*the direction of the policy and protocols was supported by all respondents...*'. This is manifestly inaccurate and leads us to believe that our concerns have not been given due consideration.

The key outstanding issues Go8 universities have with the proposed Issuance Policy are:

- The level of prescription about what should be contained on testamurs and academic transcripts is unnecessary and does not take into account the fact that these documents are not limited to AQF qualifications. Moreover, this approach does not recognise the range of legislative requirements and quality assurance processes a university is engaged with in the conferring of its awards. We suggest that the AQF Council reduce the level of prescription for self-accrediting institutions and take note of the legislative basis and broad accountability under which Australian universities operate.
- The current protocols for qualification titles, abbreviations and post-nominals are too restrictive. The protocols do not reflect the current range of qualifications offered by Australian universities, many of which are recognised internationally, nor do they allow for future developments in either domestic or international practice.

An amended list of all the specific issues raised by Go8 universities is attached to assist in redrafting the issuance policy. However, our broader concerns outlined above will require a significant rethink of the approach taken and we would be happy to work with you on this.

I have also attached a letter signed by Go8 Vice-Chancellors to the Deputy Prime Minister, the Hon. Julia Gillard MP, which refers to our high level concerns with the proposed directions of the AQF reforms. The AQF is a valuable tool for supporting the mobility of students, through the mapping of Australian qualifications to international systems. The *Strengthening the AQF* process offers an opportunity to better align Australian qualifications with international benchmarks.

As has been expressed previously, the Go8 would appreciate an opportunity to comment on the full package of changes proposed under the *Strengthening the AQF* process prior to deliberation by the Ministerial Council on Tertiary Education and Employment. Given the changing nature of the quality assurance and standards framework for tertiary education, and its move to a more regulatory basis under TEQSA, it is important the revised AQF does not inadvertently stifle innovation and the flexibility of higher education offerings in Australia.

We also ask that the submissions to all the consultations surrounding the *Strengthening the AQF* process be made publically available to ensure transparency.

Please don't hesitate to contact Bernadine Caruana, Director Policy, Go8 on (02) 6239 5488 or bernadine.caruana@go8.edu.au for further clarification. We welcome further meetings with representatives of our member universities.

Sincerely,



Michael Gallagher
Executive Director

1. An academic transcript can be issued for all qualifications, regardless of whether they are AQF qualifications or not. The definition should be amended.
2. Self accrediting institutions can accredit non-AQF qualifications; the definition for accredited qualifications should be amended.
3. An Australian Graduation Statement in the higher education sector is called Australian Higher Education Graduation Statement (AHEGS). The AHEGS has been developed with considerable input from the higher education sector as a practical way of providing more information to students and employers without changing the nature and purpose of testamurs and academic transcripts. The AHEGS should be referred to specifically in the definitions of key terms.
4. The proposed definition of components of a qualification is too limiting in that it does not include non-unit based requirements such as work experience or credentials which might be included as a requirement for the granting of a qualification.
5. Section 2.1 states that graduates will receive a testamur and an academic transcript. This could imply that these documents will be issued at no charge. Most universities currently charge for academic transcripts though not for testamurs. It is also not clear how much effort the institution has to put into ensuring that the graduate does in fact receive these documents upon graduation. It would be preferable to rephrase this to: “A testamur and academic transcript **will be made available** to all graduates.”
6. The statement that ‘*Graduates are entitled to retain the certification documentation once it has been issued regardless of their progression to a higher level qualification that builds on the first*’ (Section 2.1) does not accord with the current policy of some Go8 universities. A number of universities require students to surrender the first level qualification before being admitted to the higher level qualifications. While it is recognised that it is difficult to enforce this requirement, given the number of students to which it applies, Go8 universities would prefer to reserve the right to determine their own policies in these situations.
7. It is unclear whether the paragraph about qualifications delivered or assessed in a language other than English (Section 2.1, 2.5.1, and 2.6.1), would include students studying a foreign language as part of, for example, a Bachelor of Arts. We assume that this is not the case, as it would be impractical to include a list of the statements suggested, given that students could study a number of different languages. We suggest it is made clear that reference to ‘*language of instruction*’ on either the testamur or transcript, is only required when the majority of the course is delivered and assessed in a language other than English and it is not a foreign language course, where it would be necessary for the course to be conducted in a language other than English.
8. If a more explicit statement of other language instruction is required the graduation statement is the appropriate place for such a declaration. This is likely to become a sector wide practice once the Australian Higher Education Graduation Statement (AHEGS) is issued from 2010.

9. Go8 universities do not support the inclusion of the AQF logo nor the statement - '*This qualification is recognised within the Australian Qualifications Framework*' - on certification documents (testamurs), statements of attainment or academic transcripts (Sections 2.3, 2.5.1 and 2.5.2). The Australian Higher Education Graduation Statement (AHEGS) has been developed to provide information to employers on the equivalence of qualifications issued by self-accrediting institutions to those outlined in the AQF, and that should suffice.
10. The AQF logo and statement requirement causes complications for joint testamurs, or double badged qualification certification documents, where collaborating institutions are located in different countries or regulatory jurisdictions. Testamurs from bona fide Australian universities are already recognised internationally by both employers and other universities, as are our academic transcripts. Usually, the only reason for an employer/university to check the validity of a testamur or academic transcript is in order to assuage suspicion of fraud. Inclusion of another logo is not going to prevent this in future. Most universities have developed security measures (e.g. inbuilt watermark and security inks) to avoid fraud, and have endeavoured to do this while keeping the traditional look of the testamur.
11. As stated in section 2.2 "*The authorised issuing organisation is responsible for the authentication and verification of a graduate's certification document*". It is difficult to see how the inclusion of the AQF logo on testamurs and transcripts assists with this process.
12. In addition, internal design and approval, and student information system changes would be required within a number of Go8 universities if all certification documents were to require the inclusion of the logo and the specified statement. The Go8 recommends that existing university certification documents remain unchanged, but that – if agreed by the Department of Education, Employment and Workplace Relations - the AHEGS would be the sole vehicle for conveying the suggested logo and statement.
13. Each university will have their own format and contents for both the certification documentation (testamur) and the transcript (Section 2.5); in some cases this is outlined in university governing legislation. It is not reasonable to require all universities to have the same content and format. Institutions should retain the autonomy to design their own documents and, while they will be broadly similar, they will not be exactly the same in format and contents. The exception to this will be the basic content and format of the AHEGS.
14. The use of brackets in program titles is a matter of institutional policy (Section 2.5.1) and it is unclear why this level of prescription is seen to be necessary, especially at the level of field or stream.
15. Under Section 2.5.1, the testamur is required to include "date issued". Most university testamurs currently include the date qualified, not issued. We suggest this be added as an option "*date issued/qualified*".
16. Under Section 2.5.2, on page 10, two of the dot points refer to a "student unique identifier" and "student identification number". It would seem these phrases are referring to the same thing by different names, but in practice an individual student's "student identification number" is not the same as that student's "unique identifier".

17. Some Go8 universities ceased the practice of including the signature, name and title of the person in the organisation authorised to issue the academic transcript years ago as it was simple to copy, and in itself did not provide any guarantee of authenticity to documents. Most academic transcripts contain a statement indicating that interested parties should contact the issuing university directly for document verification.
18. Most universities do not currently include the qualification certification document (testamur) number on the transcript for completed qualifications (see par 2.5.2 dot point 6 required features). If this change is required, it has the potential to be costly as it will require student system modifications and changes to administrative processes. Universities don't link the production of the testamur and the transcript for completed awards. Most graduates want a transcript as soon as they complete in December (which indicates that their degree has been conferred), but testamurs are not printed (and hence numbers generated) until March or the presentation ceremonies in April. This becomes more complex when you consider midyear completions and delays to when a student can attend a graduation ceremony. The current version of the policy remains ambiguous in this regard as the unique issuance number is an optional element of the testamur (par 2.5.1, dot point 4 of optional elements).
19. The table of qualification titles, abbreviations and post-nominals (Section 2.7) does not include a complete list of current qualifications issued by Australian universities and indeed appears to rule out the following internationally recognised qualifications at Masters' level: Juris Doctor (JD), Medicinae Doctor or Doctor of Medicine (MD), Doctor of Physiotherapy (DPhysio), Doctor of Veterinary Medicine (DVM), Doctor of Dental Science or Doctor of Dental Medicine (DDSc/DDM) and Doctor of Optometry (OD). Rather than trying to provide a comprehensive table of qualification types, titles and abbreviations, it would be preferable for the AQF to provide overarching guidelines that reflect accepted international practice. This would facilitate international compatibility of the AQF with other frameworks and allow for innovation in qualification offerings within defined parameters. The Go8 would be happy to work further with the AQF Council to develop a set of guidelines that could be applied to higher education qualifications.
20. The latest version of the policy is inconsistent when specifying qualification titles. It states that "each word of all qualification titles will be capitalised", however in the examples given "in" and "of" are not capitalised. We recommend that the word "each" be deleted. Other comments: "Honours" would usually be included in full in the qualification title; Graduate Diploma "in" not "of"; mode of study is not usually included in the qualification title. It is important that qualification titles take into account conventions used internationally.
21. Some Go8 universities follow the terms of abbreviations used for degrees in line with the Association of Commonwealth Universities (ACU) standards. These abbreviations are documented in university policy and many universities would be reluctant to change them, particularly if such a change were to move the universities away from an internationally recognised convention for award abbreviations. (Note: the ACU standards do not include qualifications other than degree level study so abbreviations for diplomas and certificates at both undergraduate and postgraduate level are not included.)
22. The Go8 agree with the AQF Council that an honorary award is not an AQF qualification (Section 2.8). However, we would not be comfortable with having to maintain two sets of testamur paper for Honorary and non-Honorary awards, as this would impose an unnecessary cost. This supports the argument above for not including the AQF logo or the statement - 'This qualification is recognised within the Australian Qualifications Framework' - on this certificate.