PKPA

PhillipsKPA

FINAL REPORT

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Department of Education

Academic Credit Arrangements (Credit Recognition)

CONTENTS

1 EXECUTIVE SUMMARY

1.1 Overview

PhillipsKPA was commissioned to undertake background research to support the Higher Education Standards Panel's (HESP) consideration of the adequacy of the regulatory framework for academic credit pathways in higher education.

We were asked to examine the extent to which current regulation provides – or is capable of delivering – an equitable foundation for credit arrangements for students across the higher education sector. The research was undertaken in the context of the AQF Review which, as part of its remit was examining whether any change is needed to the AQF Qualifications Pathways Policy (AQFPP).

The brief had three broad points of reference:

1. Effectiveness – Assess the current regulatory frameworks' effectiveness in facilitating access to academic credit and in managing the assessment and awarding of academic credit.

2. Common approach – Investigate higher education stakeholders' views on the need for a consistent, common or complementary approach to credit recognition.

3. Guidance material – Identify the range of policy or guidance material necessary to ensure higher education providers are equipped to deliver the expectations embodied in the Standards (HESF Threshold Standards), including any future AQF policies or guidance.

1.1.1 Point of reference 1: Effectiveness

In terms of policy and guidance the current regulation appears to be capable of facilitating access to academic credit and guiding the management, assessment and awarding of credit. To the extent that it is coherent, detailed and clear in its objectives and standards the regulatory framework is capable of delivering an equitable foundation for credit arrangements for students across the higher education sector.

There is considerable detail and consistency among the official Australian policies embodied in AQFPP, HESF and relevant TEQSA guidance material and there is broad consensus in support of the principles and policies supporting credit recognition. The policy framework is also broadly aligned with international practice.

Despite this consensus of purpose however, the practice of credit recognition is observably variable across the higher education sector. There are many potential reasons for variability, most of which are defensible in the context of a system which prizes institutional autonomy and diversity. Analysis of available data on current practice provides descriptive information about the variability in use of credit but the data are not sufficiently detailed to provide deeper understanding of the reasons for the variability or its impact, whether positive or negative.

The data on credit provided to students which can be linked to graduate outcomes data or used to evaluate the effectiveness and equity of processes is very limited, it identifies associations but provides no evidence of causation. The data do show that students granted credit for prior learning towards further study do not appear to be disadvantaged in their employment outcomes. This finding may mitigate possible concerns that granting credit to students could adversely affect graduate outcomes.

The data also provide broad evidence of variability between institutions and between disciplines but allow no conclusions to be drawn as to the reasons for those variations or the extent of demand or unmet demand for credit. Institutional data collection, analysis and reporting is the only way in which such fine grained questions can be asked and answered and at the moment institutional data is patchy and largely unreported.

1.1.2 Point of reference 2: Common approach

There is no support for a common approach to credit recognition. The main objection is that it impinges on institutional autonomy for academic decision-making or implies standardised formulae or credit guidelines. There is however support for collaborative approaches to improving transparency and information for students and enhancing the provision of guidelines and best practice notes for providers.

1.1.3 Point of reference 3: Guidance material

A number of opportunities have been identified for improving the guidance material available to students and providers and are expanded upon in Section 5 of the report.

1.1.4 Challenges for implementation and evaluation of the framework

Five major issues were identified as potential challenges for the perception and maintenance of an equitable foundation for credit arrangements for students across the higher education sector. The issues have been identified from published Australian and international reports, and interviews with stakeholders.

The five overarching issues are:

1. Lack of meaningful data to allow monitoring and evaluation of demand for or effectiveness of credit recognition.
2. Variability in credit recognition practice across the higher education sector.
3. The array of potentially confusing information about credit recognition that needs to be navigated by non-expert audiences.
4. The challenges posed by the emergence of shorter form and non-formal credentials that are not covered by the Australian Qualifications Framework.
5. The need for better pre and post enrolment support for students seeking to apply for credit.

Options were identified for addressing these issues and were condensed into an Issues and Options paper which formed the basis for stakeholder consultation.

1.2 Structure of the Report

Section 2 outlines the brief and the approach taken to researching the issues and consulting peak stakeholders in the sector.

Section 3 provides background to the five overarching issues outlined as challenges above. It summarises the influences that underpin credit recognition practice including international practice, Australian policy and regulatory background, the difficulties with gathering data on and evaluating practice, the various factors that influence how institutions make credit recognition decisions, the emergence of shorter form credentials and the adequacy of information available to students and others.

Section 4 summarises the feedback from the consultation on the Issues and Options consultation paper.

Section 5 provides conclusions and recommendations and the rationale underpinning them.

1.3 Summary of recommendations

The headline recommendations are summarised below in order of priority. Further details are provided in the sections of the report noted in parentheses after each recommendation. It should be noted that if the recommendations of the AQF Review[1] are accepted close liaison with the groups charged with redeveloping the Credit Recognition and Pathways components will be required.

1. The Higher Education Standards Panel should revisit the recent Admissions Transparency process for the express purpose of encompassing "alternative admissions" and pathways and developing an implementation plan for improving transparency of credit recognition and assessment principles for non-formal and informal learning. (See Section 5.2.1).

2. The process for developing an implementation plan for transparency of alternative admissions and pathways (see Recommendation 1) should include review of the Course Seeker website and development of a plain English 'Student's Guide to Recognition of Learning'. (See Section 5.2.1).

3. As part of its required formative evaluation of the sector's compliance with enhanced admissions transparency commitments[2] by March 2020, TEQSA should be charged also with paying specific attention to providers' approaches to information about alternative admissions pathways and opportunities for credit recognition. This would complement effectively the requirement (p.15 of the Plan) that TEQSA advise HESP on

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[1] Review of the Australian Qualifications Framework Final report, 2019 (Chapters 4 and 5) https://docs-edu.govcms.gov.au/system/files/doc/other/aqf_review_2019_0.pdf

[2] Improving the transparency of higher education admissions: Joint higher education sector and Australian Government implementation plan. June 2017.

"recommendations to government on the need for further reforms to embed greater transparency in provider admission policies and processes." (See Section 5.2.2).

4. In its regular review of its guidance materials TEQSA should consider ways to ensure that advisory resources are targeted towards providing more support for non-university or smaller, newer higher education providers whose experience in credit recognition may be still developing. Specific foci for attention are addressed on Section 5.2.2.

5. Reference to the AQF Pathways Policy (or its successor post the AQF review) should be incorporated into the explanatory material supporting the relevant standards in the Higher Education Standards Framework in order to emphasise that the two are complementary rather than competing sets of documents. (See section 5.2.3).

6. Subject to further consultation to explore confidentiality and legal implications, Standard 7.3 should be reviewed to ensure that it specifies inclusion of articulation arrangements and credit agreements in a repository of publicly - available current information about the provider's operations. (See Section 5.2.4).

2 BACKGROUND AND METHOD

2.1 Project brief

PhillipsKPA was commissioned to undertake background research to support the Higher Education Standards Panel's (HESP) consideration of the adequacy of the regulatory framework for academic credit pathways in higher education.

We were asked to examine the extent to which current regulation provides – or is capable of delivering – an equitable foundation for credit arrangements for students across the higher education sector. The research was undertaken in the context of the AQF Review which, as part of its remit was examining whether any change is needed to the AQF Qualifications Pathways Policy (AQFPP).

Specifically we were asked to:

- Assess the current regulatory framework's effectiveness in facilitating access to academic credit and in managing the assessment and awarding of academic credit.

- Investigate higher education stakeholders' views on the need for a consistent, common or complementary approach to credit recognition.

- Identify the range of policy or guidance material necessary to ensure higher education providers are equipped to deliver the expectations embodied in the Standards (HESF Threshold Standards), including any future AQF policies or guidance.

2.2 Method and approach

2.2.1 Desktop literature review

Desktop reviews were undertaken to ascertain current Australian and international practice, identify any potential gaps or opportunities for improvement and to inform an options paper for consideration by stakeholders and the Higher Education Standards Panel. Information was gathered in the following ways:

- Previous reports commissioned by HESP and the Department were reviewed for relevant data and to identify gaps in existing information or practice.

- International policies and practices surrounding credit transfer were reviewed with particular attention to experiences or practices Australia could learn from or potentially adopt.

- Any relevant research or reviews addressing the conceptual as well as practical aspects of pathways and credit transfer were analysed.

- Without duplicating the survey conducted by the Ithaca Group for the AQF Review providers' websites were examined to confirm common practices vis a vis the AQF Qualifications Pathways Policy and the HESF and identify variations in the level of

information and support provided for potential students. (See Appendix A for list of websites examined.)

2.2.2 Stakeholder consultation

The following stakeholder organisations were apprised of the aims of the project and their cooperation sought in the initial phase:

- Universities Australia / Deputy Vice Chancellors Academic
- Independent Higher Education Australia (IHEA)
- Independent Tertiary Education Council Australia (ITECA)
- TAFE Directors Australia
- TEQSA including the TEQSA Student Expert Advisory Panel
- National Union of Students
- Professions Australia.

Each organisation was:

- provided with information about the project and the key issues on which their members' input would be sought at subsequent stages;
- asked to identify any relevant information, such as previous submissions, or data that they were aware of relating to credit transfer;
- asked to provide advice as to the best way to seek input from their constituencies, for example via focus groups in planned national meetings, or by specially arranged forums or by written requests for information;
- asked for their support and assistance, where appropriate in the data gathering and consultation phase.

2.2.3 Development of Issues and Options paper

A succinct issues and options paper was developed to form the basis of consultations with stakeholder groups. The Issues and Options Paper was presented as part of an Interim report to HESP and feedback from HESP was taken into account in finalising the Consultation Paper that was taken to stakeholders. (See Appendix B for the final Issues and Options Paper).

The paper was circulated to key stakeholder groups who had been consulted in the initial phase of the project. Most key groups took the decision to provide a consolidated response on behalf of their members. From verbal responses we gained the impression that it was likely that many providers felt that they had already provided what input they had to the Ithaca Group survey. Written responses to the consultation document were received from Universities Australia, Independent Higher Education Australia, Innovative Research Universities, and Regional Universities Network. Two universities also responded individually. In addition to seeking written responses an invitation was issued to the same peak stakeholder groups, and to the sub-groups of

universities (Go8, RUN, ATN, IRU) to attend a roundtable discussion convened at the Department of Education offices in Canberra. Representatives from all of the invited groups attended.

These consultations and responses were used to revise the options and formed the basis for the conclusions and recommendations presented in the final section of this report. The recommendations represent the views that were expressed and discussed in the course of consultations. The consultation process did not involve a formal survey and so it is not possible to define how representative these views were. However, all major stakeholder groups except for students were represented at the roundtable discussion and there was a high level of general agreement as to possible future directions and potentially useful actions. Some of the suggestions will involve more work than others and there is potential to place a greater burden on TEQSA than is reasonable. The recommendations, therefore, are not prioritised but represent a range of suggestions that can be taken up in the HESP and TEQSA work programs in ways that those bodies determine to be most appropriate.

2.2.4 Student engagement

Key student groups were contacted and asked to provide written feedback on:

- their awareness of the policies that encourage transfer of credit in the Australian Qualifications Framework and Higher Education Standards framework

- their views on the adequacy of those policies

- examples of issues facing students attempting to gain credit from universities and higher education providers

- their views on the adequacy of information and support available to assist students in seeking credit

- their views on barriers and challenges to applying for and being granted credit

- their suggestions as to ways in which any identified issues could be better dealt with or addressed.

Unfortunately, despite follow up no written responses were received from student groups. Student input was achieved in face to face meetings with the TEQSA Student Expert Advisory Group and a group of interested students who were attending the National Union of Students annual conference.

3 FACTORS INFLUENCING CREDIT RECOGNITION PRACTICE

3.1 International practice

Literature reviews conducted for this and other projects over the past five years reveal that Australia is addressing credit recognition practice to a level that is on par with or ahead of those countries with whom we usually benchmark our system. The Australian Government has encouraged lifelong learning, student mobility and credit transfer in higher education over some decades. The two countries to whom Australia could profitably look for models for improved practice are New Zealand and Scotland. New Zealand is noteworthy for its approach to student information which is dealt with in later sections of this report and Scotland is noteworthy for its development of a National RPL Framework for Higher Education3.

The Scottish framework was a collaborative initiative of the QAA Scotland and Universities Scotland RPL Higher Education Network intended to help "expand, enhance and embed RPL" to a greater extent within higher education institutions. It aims to address the issues that make it difficult for key stakeholders, students, staff and professional and regulatory bodies to engage with RPL. It is acknowledged in Europe as a model for others. The structure of the framework is divided into principles and practices at sector level, institutional level, student level and professional, statutory and regulatory body level.

On examination, its component parts reflect much of what exists within Australian national policy, standards and guidance frameworks. Where it differs significantly is in being represented as a systematic national collaborative framework and package that can act as an anchor and reference point for students, professions, regulators and providers. A similar outcome could be achieved by extending current Australian work on admissions transparency to encompass alternative pathways and processes for credit recognition and RPL. This is addressed in the recommendations of this report.

Other interesting centralised models can also be found, for example Quality and Qualifications Ireland4 maintains a RPL Practitioner Network to promote good practice. Some other countries maintain registries of individual learning units offered by reputable but non-regulated providers that have been accredited at specified levels for specified credit5.

3.2 Australian policy background

The policy framework within which Australia's objective to encourage lifelong learning, mobility and credit flexibility currently sits is the Australian Qualifications Framework, 2nd edition 2013

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[3] Recognition of Prior Learning. National Framework for Scottish Higher Education, 2014 QAA Scotland https://www.qaa.ac.uk/docs/qaas/enhancement-and-development/recognition-of-prior-learning---framework-for-scottish-he.pdf?sfvrsn=ae7cf581_10

[4] https://rpl-ireland.ie/

[5] Contextual Research for the Australian Qualifications Framework Review. Chapter 2, Section 2.6.1, PhillipsKPA, April 2018. https://docs.education.gov.au/system/files/doc/other/aqf_contextual_research_0.pdf

(specifically the AQF Qualifications Pathways Policy) and the Higher Educations Standards Framework (Threshold Standards 2015) within the Tertiary Education Quality and Standards Agency Act 2011.

3.2.1   Australian Qualifications Framework Qualifications Pathways Policy (AQFPP)

The AQF is currently under review but the present reference to the *AQF Qualifications Pathways Policy* references its capacity to "genuinely support students' lifelong learning"[6,7]. The Introduction to the policy indicates its purpose and scope.

> *The purpose of the policy is to maximise the credit that students can gain for learning already undertaken.*
>
> *The policy aims to:*
>
> - *enhance student progression into and between AQF qualifications*
> - *recognise the multiple pathways that students take to gain AQF qualifications and that learning can be formal, non-formal or informal, and*
> - *support the development of pathways in qualifications design.*
>
> *This policy covers all education and training sectors that issue AQF qualifications and the responsibilities for making qualification pathways accessible to students.*
>
> *The policy includes the:*
>
> - *responsibilities of providers of AQF qualifications to ensure that there are transparent pathways for students,*
> - *responsibilities of accrediting authorities and qualification developers to promote and facilitate pathways for students.*

The policy stipulates underlying principles of accessibility, transparency, flexibility, systematic implementation, regular review and the elimination of unfair or unnecessary barriers for student access to qualifications.

The responsibility for monitoring the implementation of the policy is given to accrediting authorities in each education and training sector.

Specifically, institutions that issue qualifications are expected to institute their own transparent policies and processes for credit recognition and those policies and processes are expected to be promoted publicly to allow well-informed decisions to be made. The criteria to be used in decisions to give credit are described as (briefly stated):

- evidence-based, equitable and transparent; and timely

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[6] https://www.aqf.edu.au/aqf-policies#aqf-qualifications-pathways-policy

[7] https://www.aqf.edu.au/sites/aqf/files/aqf_pathways_jan2013.pdf

- applied consistently and fairly, formally documented and with opportunity for appeal

- recognising learning that is relevant and current regardless of how it was acquired

- being academically defensible and taking account of the ability of the student to achieve the qualification's learning outcomes

- able to be used for entry or advanced standing in qualifications.

The policy explicitly safeguards students and institutions in stipulating that giving credit should not compromise the integrity of outcomes and discipline requirements, nor should it impinge on the responsibility of the institution to make decisions as to entry, program of study and successful completion.

The Policy encourages systematic inter-institutional negotiation of credit, a practice that is generally covered by the term "articulation agreements" and stipulates that the issues to be addressed in those negotiations are learning outcomes, volume of learning, content, and learning and assessment approaches. Item 2.1.10 of the policy provides guidance as to a baseline of credit in percentage terms that might be given for various AQF levels into various other levels.

3.2.2 Higher Education Standards Framework (Threshold Standards 2015)

The HESF serves to give statutory support to the AQFPP and incorporates much of the same content in relation to desired credit transfer practice. It deals with Credit and Recognition of Prior Learning (RPL) as Section 1.2 under Domain 1: Student Participation and Attainment. The HESF requires assessment for credit transfer (advanced standing) and RPL to be conducted according to institutional policies, the results recorded and timely written advice of outcomes to be given to the student. The Framework stipulates two conditions for the granting of credit:

- students granted such credit are not disadvantaged in achieving the expected learning outcomes for the course of study or qualification

- the integrity of the course of study and the qualification are maintained.

TEQSA's Guidance Note[8] on Credit Recognition and Recognition of Prior Learning offers detailed advice for managing credit which parallels both the AQFPP advice and standard academic quality assurance protocols for academic assessment and reporting including the following:

- Credit for Prior Learning is defined as; "specified and unspecified credit, exemptions, advanced standing, credit transfers and other similar outcomes, in which exemptions are granted for components of a course on the basis of having achieved equivalent learning outcomes in a course previously"[9].

- The HESF Principles for the award of credit, in particular:

  - avoiding potential disadvantage for students

  - maintaining the integrity of the course of study and its qualification

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[8] https://www.teqsa.gov.au/sites/default/files/guidance-note-credit-and-rpl-v1-1.pdf?v=1552609503

[9] https://www.teqsa.gov.au/glossary-terms-part-higher-education-standards-framework-2015

– the level of academic competence exercised in making evidence-based academic judgements.

The TEQSA Guidance Note[10] is provided as guidance to interpretation of the HESF Standard for providers of higher education. It discusses recognition of prior learning for award of credit through assessment of formal, informal and non-formal learning and describes it as "grounded in evidence-based academic judgement about equivalence of learning…. reflected in institutional policies, processes and practices concerning RPL" (p.1). It identifies institutional articulation arrangements as well as credit granted to individual students on a case by case basis. Whichever method is used it emphasises that the RPL process must "culminate in a formal notification of the outcome to the student(s) and an organisational record of the decision".

TEQSA also points out that the process of RPL impinges on other Standards in the Framework, including Standards for Admission; Orientation and Progression; Learning Outcomes; Qualifications and Certification; Monitoring, Review and Improvement; Course Design and Corporate Monitoring and Accountability.

TEQSA reinforces the Framework's two underlying conditions for credit recognition and states that "the intent of the Standards is to support the award of credit, but only where warranted". This necessitates that the institution has processes for satisfying itself that the granting of credit will not detract from the coherency (or level) of the overall program as designed by that institution or underestimate the needs of the students in the transition, both of which would potentially disadvantage students' ability to achieve the learning outcomes of the program. The exercise of experienced and evidence-based academic judgement in determining credit is essential in this process. Inherently, this sets the process of credit recognition in higher education apart from the process in vocational education where learning packages and assessed competencies and outcomes are standardised across providers.

The necessary exercise of evidence-based academic judgement, coupled with the diversity in course design leading to similar learning or professional outcomes, may result in a perception of "inequity" or "inconsistency" in credit award outcomes which has given rise to concern in some instances. The TEQSA Guidance Note offers a potential safeguard against perceived prejudice or arbitrary decision making in the application of academic judgement by reminding providers of Section 5.3 of the Standards which require external referencing of the success of student cohorts as well as external referencing of credit granting practices in comparable providers (p.3).

TEQSA has outlined a number of pitfalls in the granting of credit including academic disadvantage and inadequate support for students, failures of process leading to student dissatisfaction and inappropriate expectations, and loss of program integrity.

In determining registration and accreditation outcomes TEQSA seeks information on the institution's policies and processes and seeks evidence for the "no disadvantage" test and for the maintenance of the academic integrity of the program as well as the equivalence of the AQF levels of the credit given and the program. It is explicit in not accepting "the undue award of credit for material from lower AQF levels or material that was not credibly assessed as being at or approaching the level of the course award" (p.6). Since its inception TEQSA has imposed statutory

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[10] Guidance Note: Credit and Recognition of Prior Learning, Version 1.1 (15 March 2019). TEQSA

conditions concerning RPL on registration of 2 universities and 14 non-university higher education providers. An additional 12 conditions were imposed on course accreditation for 12 NUHEPs. The perceived risks were related to the provider's RPL policy and/or their provision of information[11]. TEQSA revised its tracking of conditions against risks in 2019 and in that year HESF Section 1.2 Credit and Recognition of Prior Learning was noted as a risk area in approximately 2% of all active conditions. A sample of the types of conditions imposed by TEQSA is provided in Appendix D.

TEQSA also advises that "where a significant proportion of students is admitted to courses with credit and RPL, the provider should specifically track the progress of these students and have evidence that can be provided to the academic governing body and TEQSA that their progress is comparable to other students" (p.6).

TEQSA's Good Practice Note[12] "Making higher education admissions transparent" provides a number of examples aimed at making admissions processes for domestic undergraduate students more transparent as required by the HESF, including:

- accessibility
- consistency and comparability
- data presentation
- quality
- how applicants are assessed.

The Good Practice Note also provides examples of good practice specifically relating to assessment of non-standard entrance criteria and credit adjustments and to the provision of specific information for the category of students who are entering from non-traditional backgrounds or via alternative pathways.

The Good Practice Note includes a checklist of minimum requirements for provider implementation of admissions transparency. It specifically advises (p.36) that providers' policies and procedures about RPL, advanced standing and credit transfer should be consistent with the admissions transparency recommendations discussed in the Good Practice Note and should be readily available on providers' websites.

3.3 Evaluation of institutional credit recognition practice

This project was required to examine the extent to which current regulation provides – or is capable of delivering – an equitable foundation for credit arrangements for students across the higher education sector. In terms of policy and guidance the current regulation seems to be reasonably capable of doing so although the practice of credit recognition is observably variable across the higher education sector. Analysis of available data on current practice provides descriptive information about the use of credit but unfortunately the data are not sufficiently

[11] Report on Statutory Conditions and Recognition of Prior Learning by Providers. Compliance and Investigations Team, TEQSA, 3 December 2019.

[12] Good Practice Note: Making higher education admissions transparent for prospective students, TEQSA July 2019. https://www.teqsa.gov.au/sites/default/files/gpn-admissions-transparency-june-2019.pdf?v=1562282945

detailed to provide deeper understanding of the reasons for the variability or its impact, whether positive or negative.

While data indicate there is a significant incidence of credit access by commencing domestic undergraduates, at round 26 per cent on average, they do not allow a comprehensive understanding of demand, unmet demand, or the outcomes and effectiveness of current practice in optimising both credit mobility and integrity of the academic qualification and the student experience. There are no baselines or benchmarks from which to determine whether equitable access to credit recognition is available for all students who may be entitled to expect it, or to monitor trends in demand, evaluate progress or make improvements to policy and practice in the face of a changing context.

An international survey of recognition, validation and accreditation of prior learning reveals that Australia is not alone in this regard and that most countries have not collected sufficient data about outcomes to indicate success nor do they have clearly defined benchmarks with regard to the degree to which RPL is considered desirable and why [13].

A report commissioned by the Department of Education, Science and Training in 2006 to evaluate practice against MCEETYA Good Practice Principles for Credit Transfer and Articulation from VET to Higher Education[14] noted "the absence of system-level data on credit transfer or agreed measures for evaluating the effectiveness of credit transfer. Institutions that are gathering and analysing data on credit transfer are hampered by the variable evaluation approaches used in different institutions and the lack of data for benchmarking" (p.22).

The Ithaca Group report [15] indicates that the inconsistency of systematic institutional data collection remained little changed in 2018, despite the inclusion of the need for monitoring outcomes of credit transfer in both the AQFPP and the HESF.

3.3.1 National data collection

In considering the relative lack of data on credit arrangements it is noted that due to problems with data quality the Higher Education Information Management System (HEIMS) has been collecting fewer elements of credit data since 2018.

HEIMS collects limited data on credit provided to students which can be linked to graduate outcomes data. However, while analysis of those figures reveals correlations valid conclusions cannot be drawn about the effects of credit provision on learning or employment outcomes. At most the data show that students granted credit for prior learning towards further study do not

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[13] Madhu Singh, Global perspectives on recognition of non-formal and informal learning. Why Recognition matters, p.177. UNESCO Institute for Lifelong Learning. Springer Open 2015 https://ec.europa.eu/epale/en/resource-centre/content/global-perspectives-recognising-non-formal-and-informal-learning

[14] Giving credit where credit is due. A national study to improve outcomes in credit transfer and articulation from Vocational and Technical education to Higher Education. PhillipsKPA, June 2006. Department of Education, Science and Training.

[15] Ithaca Group, Credit Pathways in VET and Higher Education. Research Project, October 2018, Department of Education and Training.

appear to be disadvantaged in their employment outcomes. This finding may mitigate possible concerns that granting credit to students could adversely affect graduate outcomes.

The average age of students awarded credit over the period 2016 – 2019 was 2-3 years older than those not awarded credit. Similarly, those receiving credit recognition have slightly higher ($1,000 – $2,000) median full-time graduate salaries, higher full-time employment by a small margin, slightly higher labour force participation rates but little difference in overall employment. Each of these indicators could reflect that students granted more credit are also more advanced in their studies and more likely to have established a connection with the labour market. The major impact on outcomes is that those with credit recognition are less likely to engage in further full-time study (FTS). This finding is also unsurprising given that if recognition has been granted for earlier study, the students are likely to be more advanced in their studies already.

The available data gives some insight into differences between fields of study (Figure 1). Figures provided for commencing undergraduates from 2015 -2018[16] show that the highest percentage of students awarded credit on commencement was 35.2% in in Society and Culture and the lowest was 5.7% in Health (excluding Nursing). The reasons for this are not discernible from the data but are most likely due to a number of factors including availability of articulation pathways and degree of variation across disciplines in flexibility of types of learning outcomes.

Figure 1: Percentage of domestic commencing UG students provided credit by Broad Field of Education (BFoE) 2015 – 2018
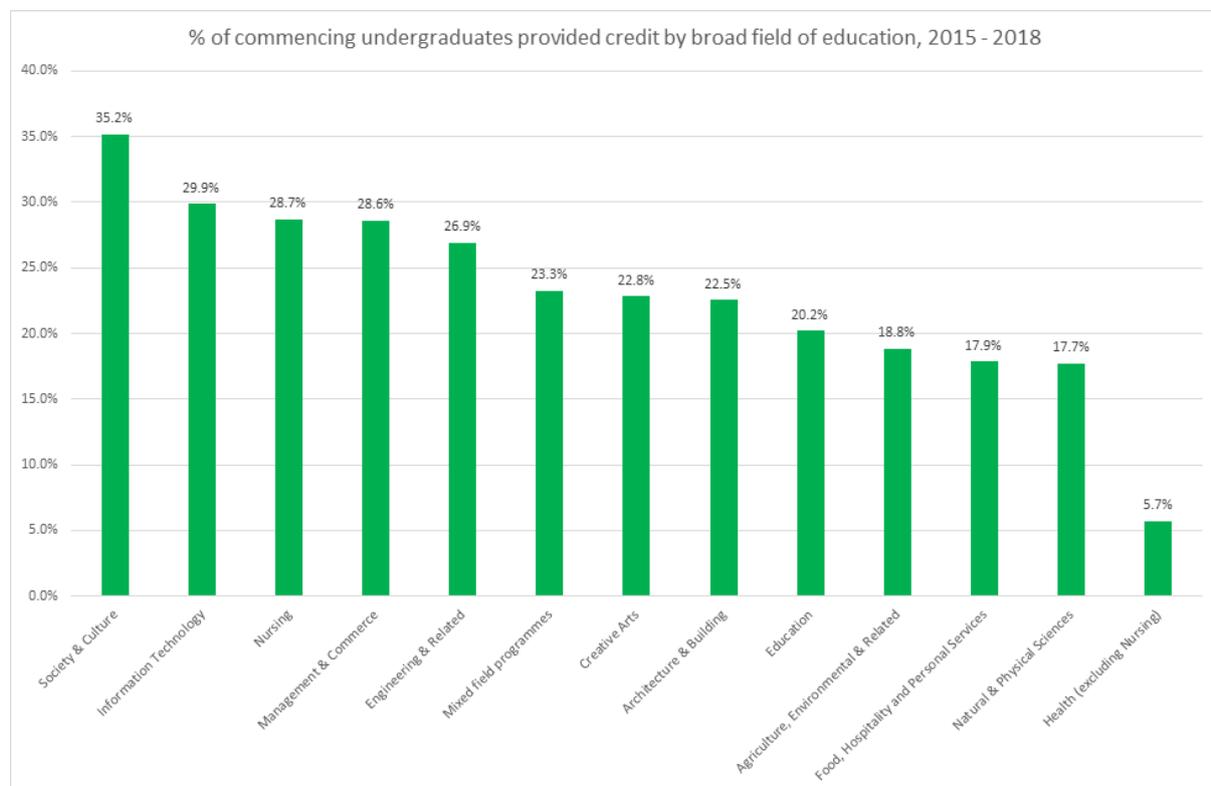
Data provided from the HEIMS collection also confirms the variation in credit awarded by different types of higher education providers. Within the Table A and B providers the percentage of

[16] Personal communication Market Analysis and Data Branch, Department of Education, August 15, 2019

domestic commencing undergraduates given credit recognition over the period 2015 – 2018 ranged from zero to 50.4% with higher percentages tending to be non-metropolitan institutions (See Figure 2). For non-university providers of higher education the percentage given credit recognition over the same period ranged from zero to over 85% (See Figure 3).

Figure 2: Percentage of domestic commencing undergraduates provided credit, all universities 2015 – 2018 (de-identified institutions).
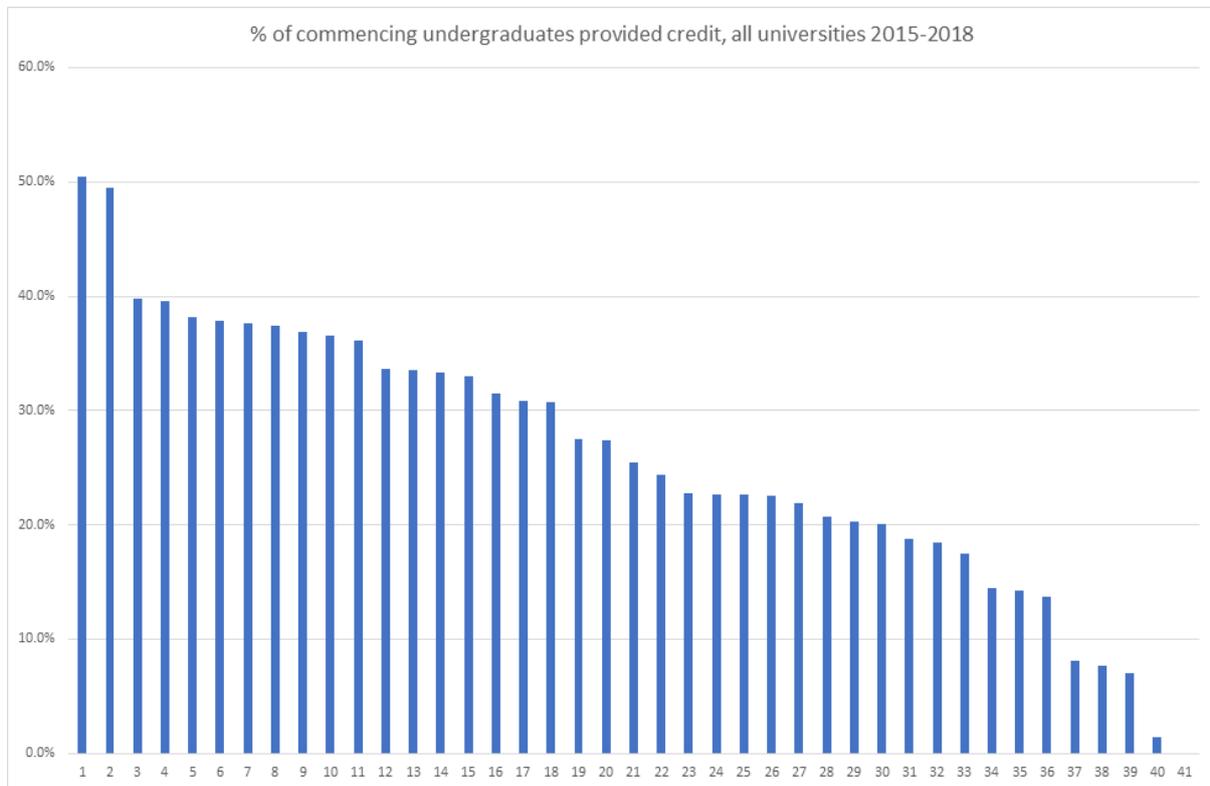
Among non-university higher education institutions (See Figure 3) it was 0% to 85.7% with over 20% of them providing zero to negligible credit.

Figure 3: Percentage of domestic commencing undergraduates provided credit, all non-university higher education institutions 2015 – 2018 (de-identified institutions).

% of commencing undergraduates provided credit, non-university HEIs 2015-2018
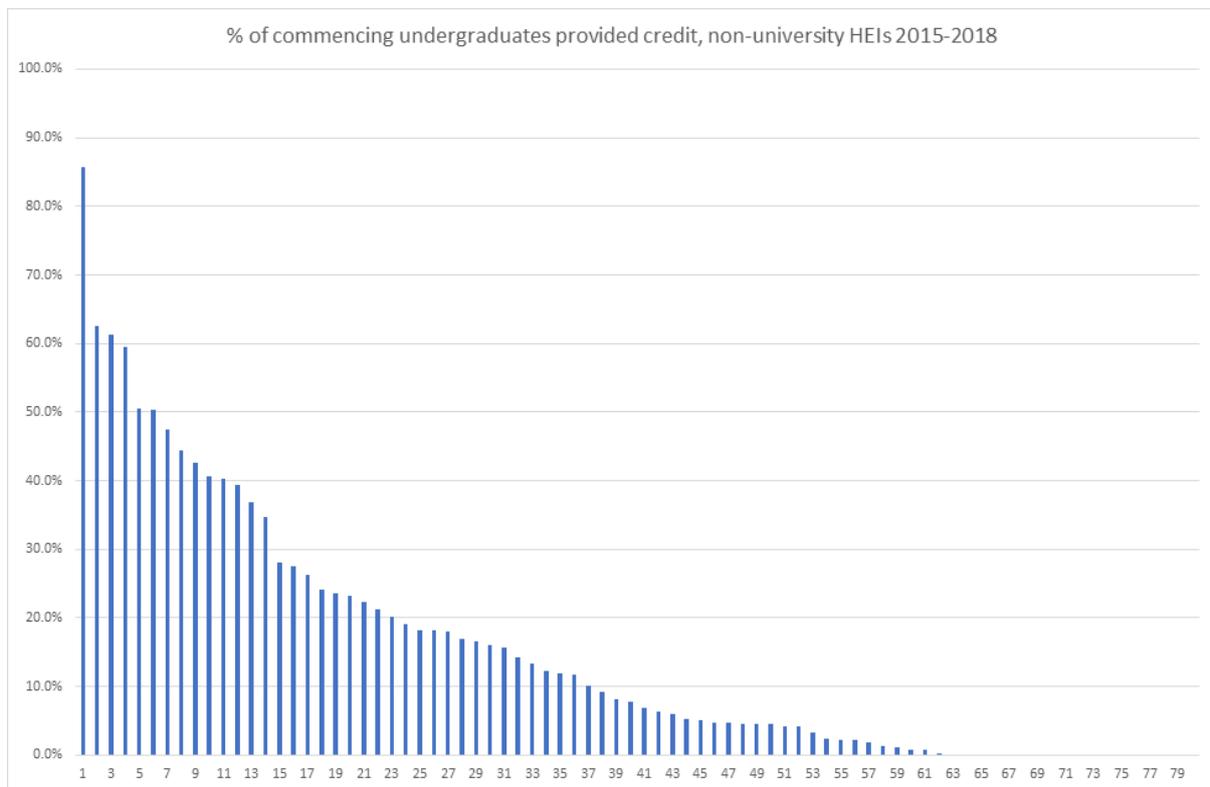
There are many possible reasons for the observed wide range of variation in credit granted by institutions and these are discussed below (Section 3.4). Broadly speaking it is possible to identify differences between some like groups of higher education providers, for example, large older metropolitan versus smaller newer or regional providers and non-university providers. The data reflect the diversity in the system but do not allow conclusions as to whether this signals a problem with effectiveness or equity in the practices adopted by various institutions.

To assess effectiveness of the current regulatory framework in meeting the policy objectives for credit recognition and ensuring equity in its application, more fine-grained information is needed on institutions' actual experience of requests for credit, approval rates for awarding credit, reasons for non-award of credit, and performance of cohorts of students awarded various levels of credit. However, the recent research by Ithaca Group[17] suggests that record keeping and monitoring of the progress of student cohorts who are granted credit is variable across the sector and even within individual institutions (p.31) and is more difficult to achieve for those institutions that do not currently have centralised record keeping.

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[17] Ithaca Group, Credit Pathways in VET and Higher Education. Research Project, October 2018, Department of Education and Training.

3.3.2 Institutional data collection

Monitoring and reporting on the progress of cohorts of students admitted with advanced standing or RPL is a necessary component of academic governance that is understood as central to quality assurance and continuous improvement. The policies and guidelines recognise this. Both the HESF and the TEQSA Guidance Note are explicit about the need for "evidence-based academic decision making" in regard to the award of credit. They are also explicit about the need to maintain formal records in relation to the award of credit, to monitor student progress and to benchmark with like institutions in order to build that evidence base. TEQSA's Guidance Note on Credit Recognition and RPL[18] specifies that ……"[w]here a significant proportion of students is admitted to courses with credit and RPL, the provider should specifically track the progress of these students (see requirements of Standards 1.3.5, 5.3.4 and 5.3.7) and have evidence that can be provided to the academic governing body and to TEQSA that their progress is comparable to other students" (p. 6).

Options and recommendations in Sections 4 and 5 of this report suggest ways in which institutional data collection on the outcomes of credit awarded could be improved. Consistent institutional reporting to academic governance bodies and to TEQSA for non–self-accrediting institutions is the first step towards establishing an evidence base that would allow for evaluation, benchmarking and improvement in credit recognition practice across the sector.

3.4 Factors underlying variations in credit recognition practice

The many factors that can account for variation in practice can be documented but in the absence of more detailed data it is impossible to draw conclusions as to the magnitude of their impact on effectiveness and equitable treatment of students.

Some factors which at first glance suggest inconsistency and a failure to either offer or request potentially available maximum credit for prior learning may simply reflect the diversity of the system operating within the parameters of the policy guidelines. The decision to emphasise or de-emphasise the award of academic credit for prior learning is effectively a choice made by individual institutions according to their perceptions of their own needs and the needs of their student recruitment pool. The regulatory framework incorporates no imperatives or incentives to promote credit recognition beyond the exhortations of the policy and standards and the strategic decisions of each institution.

These issues are not specific to the Australian system. Reviews of the literature on credit transfer in higher education conducted in the UK in 2012 and 2017 found that the international evidence base is small and that the UK sector faces a very similar set of challenges to those identified in

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[18] Guidance Note: Credit and Recognition of Prior Learning, Version 1.1 (15 March 2019). TEQSA, p.6.

Australia[19,20]. The list of challenges and barriers identified in these literature reviews mirrors closely those identified below in this report as well as those identified in the Ithaca Group report. In the UK the volume of students making use of credit is small, there is no common framework for credit transfer across UK nations and the ability to recognise and transfer credit relies on the practices and policies of individual institutions. Although the US system of community colleges and state universities differs significantly from the Australian system, a review of the loss of credit in transfer from 2 year colleges into 4 year institutions also found a similar set of issues limiting maximum credit transfer[21], with an estimated fewer than one third of students who transferred institutions within 6 years of initial enrolment being able to transfer all of their credits.

3.4.1 Making decisions about how much credit to give

Stakeholders report a perception that academic judgement is sometimes tempered by institutional history and reputation and that some qualifications from some types of providers are judged to be less worthy of credit, or that some students from those institutions are assumed to be less academically prepared. There is no reliable objective evidence to support this but its pervasiveness in 'corridor conversation' lends it legitimacy. Complaints about providers who do not "maximise" credit might suggest a lack of equitable treatment. Alternatively, declining to maximise credit may well reflect an institution's caution in protecting students or the reputation of the institution or both. A number of factors are involved in making decisions about how much credit should be offered:

- policy guidance

- precedents

- institutional capacity

- institutional objectives

- flexibility of program design - mapping learning outcomes and maintaining the integrity of the academic program.

3.4.1.1 What does the policy say?

The AQFPP cites as its purpose to "maximise" the credit that can be awarded. From that there is the risk that some may regard actively promoting and awarding credit as the overarching goal and pay less attention to the qualifying conditions set out in both the AQFPP and the HESF and in some detail in the TEQSA Guidance Notes. Those conditions focus attention on the need to ensure that

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[19] Souto-Otero, M., Review of credit accumulation and transfer policy and practice in UK higher education The Higher Education Academy, 2013
https://www.heacademy.ac.uk/system/files/resources/review_of_transfer_of_credit_report.pdf

[20] Pollard, E., Hadjivassiliou, K.,Swift, S. and Green, M. Credit transfer in higher education. A review of the literature. Department for Education, March 2017. https://www.employment-studies.co.uk/resource/credit-transfer-higher-education

[21] Giani, M.S., The correlates of credit loss: How demographics, pre-transfer academics, and institutions relate to the loss of credits for vertical transfer students. Research in Higher Education. Published online 21 February 2019
https://doi.org/10.1007/s11162-019-09548-w.

credit decisions are "academically defensible" and that credit is not awarded inappropriately such that either the student experience or the integrity of the qualification is placed at risk. There is no evidence that this is a major problem but the possibility exists that it does influence some providers. Equally there is a risk that some may be over-zealous in their approach to safeguarding integrity of the academic program at the cost of awarding credit that is due.

TEQSA's Guidance Note on Credit and RPL outlines in some detail 'Risks to Quality'. This emphasis on risk is aligned with the Three Basic Principles for Regulation articulated in the TEQSA Act (section 13):

- principle of regulatory necessity
- the principle of reflecting risk
- the principle of proportionate regulation

The Guidance Note concentrates on the avoidance of risk to student learning outcomes and to the integrity of the academic program. It misses the opportunity to also identify a risk that the AQFPP has been designed to mitigate – that is the risk that credit will not be maximised and that students will lose time and money in repeating study for which they have already achieved the learning outcomes.

The risks of failure to award due credit could also be added to the list of risks in the TEQSA Guidance Note, thus supporting the intent of the AQFPP.

3.4.1.2   Precedents that support academic judgement

Meaningful evaluation of the performance of cohorts of students and of the institution's effectiveness in supporting students who have entered by alternative pathways essentially relies on collection and reporting of data and precedents at institutional level and subsequent benchmarking efforts.

The Ithaca Group survey (p.22) sought information from providers on the mechanisms they use when making credit decisions. The most cited reference points were precedent databases, maximum credit allowances set by the institution and articulation agreements.

Given the need to counter a perception of bias or inappropriate considerations in academic judgement it would seem that a reference credit register at the institutional level is a necessary safeguard against decisions made on other than academic criteria. Such registers would facilitate both internal (between discipline) and external (between like institutions) benchmarking. Some providers offer a model for that improvement and others have reported to the Ithaca Group that they are actively working on the development of such registers. For example, James Cook University's Credit and Articulation Policy[22] requires that performance data on cohorts of students given credit is used for internal quality assurance. It specifically requires that "[T]o ensure continuous improvement is evident, regular performance metrics by discipline will be provided to the Director, Academic Quality and Strategy …… and Director, Student Services".

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[22] https://www.jcu.edu.au/policy/student-services/advanced-standing-and-articulation-policy

It has been suggested that a Register of AQF qualification pathways similar to the current NSW TAFE credit transfer website[23] could list credit transfer agreements, and even credit decision precedents in higher education. This would theoretically provide more certainty and transparency to students about the potential outcome of a request for credit.[24] Submissions to the AQF review revealed a lack of support for this proposal. While many saw it as having potential benefits the bulk of the feedback cast doubt on whether the effort and resources needed to both establish and maintain currency of such a register would be justified by unproven potential benefits.

3.4.1.3   Institutional capacity to manage assessment of prior learning

Australian higher education providers vary extensively, in size, discipline mix, history, culture, resource availability and capacity. Most universities have extensive experience, mechanisms and precedents for academic decision making for credit recognition. On the other hand, smaller and younger non-university providers generally lack that institutional history and experience, the volume of precedents and the mechanisms to support complex RPL processes. Currently within sector diversity is not adequately acknowledged in the expectations of the policies and guidance notes which may assume a certain level of capacity and institutional experience that may not always be present. A potential outcome of this set of assumptions is a lack of confidence and a reluctance on the part of some providers to enter into the process too deeply, or a tendency to do so in less flexible ways, or to have less comprehensive information available to students.

An opportunity exists within the TEQSA process for accreditation of programs offered by non-self-accrediting providers. Best Practice Notes relating to credit recognition could be developed specifically to support those providers with less historical precedent or institutional capacity.

3.4.1.4   Institutional objectives for credit recognition

Higher education providers are a very diverse collection of institutions with diverse missions, objectives, discipline mix and business models.

Several national consultations on RPL and credit arrangements[25,26,27] have found that there is widespread agreement among providers, both public and private, that a "one size fits all" mandated approach or standards for credit recognition is not desirable or feasible and that each institution should develop its own approaches as long as all processes are well documented and

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[23] NSW TAFE, Credit Transfer

[24] Discussion Paper: Review of the Australian Qualifications Framework, December 2018, p.31.
https://docs.education.gov.au/node/51926

[25] Ewan C, Higher Education Standards in a Disaggregated Learning Environment , Final report 2016. Office for Learning & Teaching. https://altf.org/wp-content/uploads/2016/08/Ewan_C_HESP_Fellow_Report_2016.pdf

[26] Submissions to the AQF Review, Discussion Paper, 2018.
https://submissions.education.gov.au/forms/aqf2019/pages/index

[27] Contextual Research for the Australian Qualifications Framework Review. PhillipsKPA, April 2018.
https://docs.education.gov.au/system/files/doc/other/aqf_contextual_research_0.pdf

subject to equivalent quality assurance processes as assessment of learning outcomes in academic programs. Consultations with stakeholders for this project strongly reinforced that view.

The AQFPP, the HESF and the TEQSA guidance all stress the need for equitable access, transparency, flexibility and active promotion of opportunities to access credit. These goals are in the service of increasing participation in the sector by a diverse student population. Providers generally share these goals and develop strategies for achieving them. However, they do so within the context of their own institutional goals and missions. The Ithaca Group study found that virtually all universities and many non-university higher education providers (NUHEPs) are generally operating within the policies and guidelines. They are most likely doing so in ways that are tailored specifically for their targeted student base and their institutional discipline base, mission and objectives.

Given the diversity among higher education providers, variability is inevitable; different providers, responsive to their particular strategic missions and objectives, use credit recognition for different purposes. International experience is similar. In the UK "it has been argued that there is a tension in the policy expectation that all institutions should embrace credit transfer equally when there is also a growing expectation for institutional diversity. In this context some institutions simply do not see the added value of credit schemes".[28]

Credit recognition has a range of potential purposes for both students and providers such as:

- increasing opportunities for students to move across institutions without penalty as life circumstances change
- providing incentives (or removing disincentives) for students to increase their skills and pursue lifelong learning
- eliminating or reducing the need for students to duplicate previous study
- facilitating flexibility and efficiency in course design and delivery
- attracting and recruiting students
- reducing cost to students by discounting the price of a qualification.

Providers may use credit recognition for all or only some of these purposes dependent upon their own institutional contexts and market position. The various uses of credit recognition are expanded in following paragraphs.

- As envisaged by the AQFPP credit recognition is a facilitator of flexibility and mobility

The wide range of articulation agreements within groups of higher education providers (e.g. Group of Eight Credit Transfer Agreement) and between vocational or foundational program providers and higher education providers attests to the general willingness of the sector to facilitate credit mobility, albeit to varying extents, as envisaged by the AQFPP. Using credit in this way satisfies the

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[28] Souto-Otero, M., Review of credit accumulation and transfer policy and practice in UK higher education, p. 6. The Higher Education Academy, 2013.
https://www.heacademy.ac.uk/system/files/resources/review_of_transfer_of_credit_report.pdf

intent of the AQFPP in minimising the need for students to duplicate learning unnecessarily and thereby to optimise their time and reduce their costs.

Articulation agreements are the best way to optimise the student experience of mobility between and across levels of the AQF because they represent partnerships tailored for that purpose. They, however, labour intensive to develop and maintain and require a high level of trust between the partners.

In the absence of institution to institution partnership or articulation agreements credit mobility is far less straight forward. There may, for example, be discipline specific issues that impact on credit available in the same discipline from year to year. One such example provided by stakeholders is courses in digital design and technology that quickly become outdated meaning that the window for recency of learning that is suitable for credit recognition may be narrowed to as little as a year or two. In these cases, providers are making judgements based on their knowledge of employer demand and skills turnover.

Other issues may be institution specific. For example, there are complaints from stakeholders that the same qualifications are viewed differently dependent upon the perceived standing of the provider where the qualification was earned. There is a frequently cited belief that decisions about the extent of credit available rest on perceptions about the quality or status of the institution awarding the degree. Underpinning those perceptions is the level of trust that credit decision makers have in the selection and assessment processes of the institution. In a national system where registration and accreditation of providers and courses is overseen by a national regulator these perceptions and lack of trust are difficult to defend, yet they persist.

Other issues relate to sector differences. Feedback from a specific group of providers raised serious concerns over perceived flaws in the regulation of the VET sector and some of its "questionable providers" leading to their views that it is "dangerous" to award credit for some VET qualifications. The issue of relative value of VET versus higher education diplomas has also been raised in submissions to the AQF review[29] where some submissions pointed to the non-

equivalence of Diplomas accredited by ASQA and Diplomas accredited by TEQSA or a self-accrediting institution. The problem is framed as neither the design nor the delivery of an ASQA accredited Diploma (which potentially earns a significant level of credit into a bachelors degree) requires learners to engage with advanced knowledge and inquiry, potentially leaving students admitted with credit insufficiently prepared for achieving the learning outcomes of the rest of the program. Reinforcing this concern some professional bodies are concerned that they "don't really know what they are getting" from graduates who have been granted RPL exemptions because the RPL system has fewer checks and balances than accredited programs.

The effectiveness of credit recognition used for flexibility and mobility rests heavily on trust between institutions and sectors. Articulation agreements represent the operational evidence of that trust. It has been suggested by an author with considerable experience in the Australian sector that granting credit for another institution's program is underpinned by trust resulting from "reputation, knowledge of the institution due to proximity, or belief in its accountability processes". This author also suggests that the rapid expansion of tertiary education and

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[29] https://submissions.education.gov.au/forms/aqf2019/pages/index

globalisation have made these traditional bases of trust more problematic[30]. To expansion and globalisation one could also add the influence of commercialisation as providers increasingly seek to maximise their share of the fee paying student markets.

The issues related to "parity of esteem" among providers are a complex mix of history, culture and experience and are not easily resolved.

- As employed by some providers, credit recognition is a marketing strategy and recruitment pathway

For some providers promotion of alternative entry and credit recognition pathways is a necessary and legitimate marketing and recruitment strategy to achieve their stated mission, for others the mission may require a less broad-based proactive outreach. Examination of the websites of universities reveals this variation in strategy. A study carried out in 2013 showed that one third of Australia's universities provide two thirds of the pathways from VET to higher education[31].

Some providers for whom credit recognition is an important recruitment strategy advertise a high level of formal articulation agreement activity as well as offering web-based strategies for assisting individual students to calculate likely credit before application and to apply online. Examples of informative and facilitatory websites are Western Sydney University[32], Charles Sturt University[33], Southern Cross University[34] and University of South Australia[35]. Australian Catholic University offers a searchable online articulation database and downloadable application for credit recognition which allows potential students to check their eligibility for credit or entry into a relevant ACU degree[36]. A less proactive stance in provision of online opportunities to interrogate likely levels of credit or RPL through searchable databases is evident on websites of some of the Group of Eight Universities whose recruitment pool and mission differs from, for example, regional universities and whose articulation pathways differ accordingly.

Internal articulation is also an important strategy especially for international student attraction. For example, University of Adelaide College[37] is a 'Preferred Pathway Provider' of the University of Adelaide preparing international students for entry into undergraduate courses through a degree transfer pathway for entry into second year of most degree programs. It also offers a Pre-Master's

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[30] Gallagher, M. Standards-based accountability in higher education in Australia. In K.Norrie & M.C. Lennon (Eds) 2013. Measuring the value of a postsecondary education (pp53-83) Montreal and Kingston: McGill-Queen's University Press.

[31] Chesters, J, Watson, L Hagel, P (2013) A half-open door: pathways for VET award holders into Australian universities. NCVER https://www.ncver.edu.au/research-and-statistics/publications/all-publications/a-half-open-door-pathways-for-vet-award-holders-into-australian-universities

[32] https://www.westernsydney.edu.au/tertiaryeducationpathwaysandpartnerships/home/background

[33] https://credit.csu.edu.au/modeler/25690/programs

[34] https://www.scu.edu.au/media/scueduau/study-at-scu/pathways-to-scu/main-reports/Credit-Transfer-into-Southern-Cross-courses.pdf

[35] http://creditassessor.unisa.edu.au/public/creditassessor/

[36] https://www.acu.edu.au/study-at-acu/credit-and-prior-learning/articulation

program as a bridging course into any postgraduate degree at the university. Most universities have variations on this model of "enabling programs" for both domestic and international markets.

In general, enabling programs may articulate but are themselves not qualifications. A review of enabling programs and sub-bachelor pathways for disadvantaged students conducted in 2015[38] found that students undertaking enabling programs felt better prepared for university studies than students articulating through VET pathways. The review found a wide range of enabling programs but their effectiveness in providing wider access was limited by the fact that most higher education institutions recognise only their own enabling programs for articulation purposes. Most enabling programs also offer articulation into only a limited range of higher education courses. The review also found a lack of transparency, transferability and information about enabling programs that is "likely to hinder student take-up, mobility and progression" (p.9).

- Credit can be seen as a commodity with market value

Providers are acting within a marketplace where they have institutional positioning and market segmentation to consider, not to mention revenue. In this context, award of credit can be a form of price discounting. If offered too generously it can be seen as a reputational risk. In previous research[39] as well as this current research providers have reported that in a competitive market for students some believe they have been "undercut" by other providers prepared to offer more credit (and therefore lower total fees) to attract more students. In turn this results in pressure from their own marketing departments to be more generous in their credit determinations. Some report that students become engaged in a "bidding war" with different providers to maximise the level of credit and therefore the discounting of fees that they can achieve. There is concern that this could lead to "inflationary pressures" on credit recognition and a consequent lowering of standards. These concerns have been expressed by both public self-accrediting institutions and private non-self-accrediting institutions so it is apparent that the issue is not confined to a specific segment of the sector.

3.4.1.5   Standard credit formulae vs diversity of program design

Assumptions underpinning exemplar credits for qualifications in the AQF do not reflect the reality of higher education program design and sometimes generate misleading expectations and dissatisfaction with credit granted. For example, Section 2.1.10 of the AQFPP cites percentages of credit that could be given for progressions from one level of qualification to the next. It suggests baseline credit for advancing from Advanced Diploma, Associate Degree and Diploma to a Bachelors degree. While this is clearly stated to be guidance only there is scope for some to interpret the quantitative guidelines as prescriptive or advisory. In reality, few higher education institutions would award specified credit only on the basis of program or unit titles or duration of

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[38] Pathways to Higher Education: The efficacy of enabling and sub-bachelor pathways for disadvantaged students. Curtin University National centre for Student Equity in Higher Education report for the Australian Government Department of Education and Training, 13 May 2016. ncsehe.edu.au

[39] Ewan C, Higher Education Standards in a Disaggregated Learning Environment , Final report 2016. Office for Learning & Teaching. https://altf.org/wp-content/uploads/2016/08/Ewan_C_HESP_Fellow_Report_2016.pdf

study at another institution. This is the area in which discretion is called for and in which most complaints or appeals may be expected.

It is tempting to envisage a more standardised formula for credit calculation that could apply across the system but such a formulaic approach could not work in the context of a highly diversified, predominantly self-accrediting system. Variation in degree structure is often dictated by educational philosophy of the institution and used as a differentiating feature to attract students. The reality is that many higher education programs are not easily subdivided into hierarchical chunks of learning. This applies equally to professional disciplines with professional accreditation requirements. Those requirements influence the content, skills and concepts underpinning practice but rarely if ever the structure of a degree. Even where a profession is interested in the nature of articulation provided the interest stems from concern that all learning outcomes are covered under the credit arrangement.

There is an inherent tension between the theoretical concept of a degree as a hierarchical accumulation of learning outcomes and the reality of academic practice where a degree program is developed as a coherent whole congruent with the institution's mission and philosophy as well as the professional requirements for graduates. The Ithaca Report highlights the fact that many staff who undertake the work involved in negotiating articulation pathways consider that the process is "significantly more complex than envisaged by the [AQF Qualifications Pathways] Policy" (p.51).

Two considerations are paramount in determining how much credit to award: ensuring that students achieve the learning outcomes for their program and ensuring that the integrity of the academic program is maintained.

- Mapping learning outcomes

A survey of providers' websites across the range from metropolitan, regional and private providers reveals that the predominant approach to assessing credit is based on analysis of learning outcomes achieved, whether by formal documentation or by skills and knowledge assessment, and a comparison of those learning outcomes with the outcomes required in the course of study for which credit is sought.

Application of standard credit formulae outside of formal articulation agreements is not evident which is not surprising given the vast range of possibilities for individual credit transfer across the sector and between sectors.

The implication is that set percentages in recognition of contact hours or volume of learning or even subject names do not necessarily map onto specific subject learning outcomes, particularly in core units of degree programs. However, full credit can be and is often given for completion of relevant subjects towards elective non-core components of programs where the objectives do not map onto core learning objectives of the degree.

Indicative levels of credit as provided in the AQFPP, while helpful as a basis for consideration, are not in any way an indication of the credit that will be available in different academic programs

from different providers. This needs to be more explicit in information provided to potential students.

- Balancing integrity of the academic program and credit flexibility

Some providers have policies specifying maximum limits for carrying credit into a program e.g. 20% or 50%. These limits where they are applied exist because providers wish to protect their reputations for providing degrees that reflect the institution's values and standards. The institution's academic governing body approves a program on the basis that it reflects the institution's values, philosophies and standards. It approves a total package including its underlying educational philosophy, the planned sequence, content and learning and assessment modes, its prerequisites and required courses and its relationships to potential employers and its community. This package constitutes the integrity of the academic program and any exemptions from it have to be carefully considered within the total context. The AQFPP and the HESF emphasise maintenance of the integrity of the degree as a basic principle.

It is an unavoidable fact that program integrity may come at the price of decreased flexibility for credit recognition. For example, first year Law or Engineering in one university may well be totally different in content, structure and learning style from first year Law or Engineering in another and the mapping of learning outcomes may be very complex, crossing many subject boundaries and not resulting in a neat percentage of credit outcome. In another field, Education, a 2012 report cited in recent research by the Australian Council for Education Research[40] found that four universities granted different levels of credit towards their Bachelor of Early Childhood Education for a VET Diploma in Children's Services. These decisions could be the result of application of different academic judgements but they also could reflect differences in the program structures and pedagogical philosophies in the four universities.

One potential approach to such gaps or mismatches between learning outcomes is counselling the individual student and identifying suitable supplementary bridging studies. This option is possible given the array of readily accessible online material now available, although it necessitates individual counselling and is labour intensive. On the other hand, traditional bridging courses or programs are feasible and effective within the context of articulation agreements and partnerships between institutions that facilitate the mobility of cohorts of students, for example from foundation studies programs into degree programs.

These types of considerations create issues where student expectations of receiving full credit for completion, for example, of a first year program at another institution, or a TAFE Diploma in a cognate discipline, may not be able to be met by the receiving institution. One interpretation of this result is that the receiving institution is not meeting its obligations for maximum equitable credit under the AQFPP but the alternative explanation is that it is meeting its obligations to protect the student from failure and/or to maintain academic integrity under both the HESF and the AQFPP. The best safeguard that credit levels are equitable and appropriate rests in the academic governance of the institution and its handling and oversight of learning outcomes as well as student appeals.

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[40] Justin Brown, Credit based pathways in tertiary education. ACER, 2017. https://rd.acer.org/article/credit-based-pathways-in-tertiary-education

3.5 Challenges posed by emergence of shorter form and non-formal credentials

In responding to the survey conducted by the Ithaca Group 73% of higher education respondents indicated that their institution provided micro-credentials, skill sets, short courses, and/or unaccredited programs (p.27). The Ithaca report and the contextual research for the AQF Review[41] both pointed to the need for consideration of the rapidly increasing market demand for shorter form qualifications with the likely increase in demand for recognition of non-formal and informal learning for credit towards AQF qualifications. Most providers, however, indicated to the Ithaca Group that the recognition of informal and non-formal learning is currently under-used and neither particularly encouraged by providers nor particularly requested by students (p.43).

Whether or not market forces make more significant demands in this arena in the near future it is clear that non-traditional approaches to accumulating learning credit add potential complications to the assessment of evidence of learning outcomes for credit recognition. In turn this has implications for the perception of equity and consistency.

The Review of the AQF is addressing issues that were raised in the contextual research conducted prior to its commencement, in relation to the linear and hierarchical nature of the AQF and the lack of capacity in its current form to accommodate sub-qualifications level learning or enabling courses. Equally the present version of the AQF does not easily accommodate the growing trend towards carrying credit from a higher AQF level qualification towards a lower AQF level qualification. A discussion paper[42] produced in support of the AQF Review provides a comprehensive summary of the state of play internationally in relation to incorporation of shorter form credentials into Qualifications Frameworks. The final AQF review may have more to offer on this topic. A report commissioned as part of the AQF Review process[43] provides a comprehensive overview of the necessary conditions for making shorter form qualifications effective and sustainable. Foremost among those conditions is the need to clarify the standards expected in order to earn admission or credit towards a formal qualification.

These issues cannot be addressed within this brief but it is clear that current guidelines may require review in order to ensure consistency and equity in practice as the patterns of desired credit mobility become more diverse – upwards, downwards and laterally.

3.6 Provision of accessible information about credit options

Both the AQFPP and the HESF place considerable emphasis on proactive communication with students about credit options and support for them in accessing credit. Information on recognition of prior learning and credit options is available on admissions centres' websites and

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[41] Contextual Research for the Australian Qualifications Framework Review. PhillipsKPA, April 2018.
https://docs.education.gov.au/system/files/doc/other/aqf_contextual_research_0.pdf

[42] Other countries – Shorter Form Credentials in Qualifications Frameworks
https://docs.education.gov.au/system/files/doc/other/aqfrothercountries.pdf

[43] Oliver, B 2019 Making micro-credentials work for learners, employers and providers. Deakin University
http://dteach.deakin.edu.au/microcredentials/

individual providers' websites. A scan of the websites most likely to be consulted by potential students indicates how complex the concepts, criteria and processes can appear to those outside or newly arrived in the higher education system. In particular, potential students starting from any base other than a recently completed secondary school qualification are not well catered for, and these are the students most likely to be seeking credit recognition for prior learning or experience.

3.6.1 Do providers offer sufficient information and support?

The Ithaca research asked the question "Are provider policies easily accessible and promoted to prospective and existing students?". Results are summarised on pp. 13-15 of their report. Information on providers' websites is extremely variable and has also been comprehensively analysed in the Ithaca Report (Appendix A6). The study found that 92% of universities include information on credit policy and practice on their website compared with only 50% of non-university higher education providers however there is considerable variation in accessibility, reliability and currency of this information. For example, 62% of universities publish tools or links to help students to calculate potential credit but none of the non-university providers did. Most information is available at the admissions and enrolment process for both groups. The same study found that "most learners are unaware of what credit they may be entitled to and how they would apply for it and that many who are entitled to credit choose not to take it up for a variety of reasons, mainly logistical" (p.14). The transparency and consistency of the information available to potential students is expected to increase as a result of the introduction of 'information sets' to convey whole of institution admission policies arising out of the admissions transparency implementation plan[44].

In essence maintaining the large volume of required information in accessible and current form represents a considerable challenge more effectively dealt with by some institutions than others. As a result, the requirement that providers be proactive in promoting credit pathways is, in practice, often not met with the onus being on students to request credit. Students are often unaware of the possibility of RPL or how to apply for it but there is no data to determine whether there would be greater demand if there were greater awareness. A similar need for better explanation of enabling programs with articulation options was found in the review of pathways for disadvantaged student groups[45] (p.11).

Students who were consulted in the course of this research referred to a need for more support at institutional level, both prior to and after enrolment. The HESF requires that students be made aware of "policies, arrangements and potential eligibility for credit for prior learning" (Standard 1.1 Admission) prior to enrolment and payment of fees but this does not appear to occur uniformly with some students reporting that they are only able to seek information after enrolment. Although policies and procedures are usually published on websites, students report some difficulty post-enrolment in negotiating credit transfers even between subjects and courses within one institution. Some institutions operate an identified central office with designated personnel to

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[44] Improving the transparency of higher education admissions: Joint higher education sector and Australian Government implementation plan. June 2017

[45] Pathways to Higher Education: The efficacy of enabling and sub-bachelor pathways for disadvantaged students. Curtin University National centre for Student Equity in Higher Education report for the Australian Government Department of Education and Training, 13 May 2016. ncsehe.edu.au

whom students can take their problems and queries and this is effective and appreciated. However, students in other institutions report being handed from one point to another because there is no central source of answers to the questions they have.

3.6.2 What types of information do institutions provide?

In general, information for potential students that is available covers:

- articulation arrangements
- credit calculation
- types of evidence that will be used to determine credit.

3.6.2.1 Recognition of formal learning for credit through articulation agreements

Inter-institutional negotiated credit and articulation agreements enable students to progress from one recognised academic program (formal learning) to another with admission and/or credit in a defined pathway with agreed credit recognition. Partnerships and articulation agreements negate the need to undertake laborious learning outcome comparisons on a case by case basis because such comparisons have formed part of the agreement process.

There is no easy way to compare different types of credit available from different institutions and therefore no easy way for potential students to assess how to maximise their credit transfer. Where articulation agreements do exist it is possible to give students an estimate of likely available credit for specified study at specified institutions over specified time periods.

Some provider websites provide detailed information with credit calculators and articulation agreement registers. Students must input the discipline, the time since study was completed and the institution from which they seek to carry formal credit into a degree at the receiving institution. Users of the calculators may receive a "quote" which is not a guarantee for credit. However, not all providers offer these calculators and their availability on a broader basis, such as through databases of precedents as well as articulation agreements, would enhance access to information without the need to resort to time consuming telephone or interview enquiries. Developing such precedent databases and credit calculators might be particularly challenging for smaller non-university higher education providers. Independent Higher Education Australia (IHEA) and Independent Tertiary Education Council Australia (ITECA) could have a role in supporting collaborative activity among their members to develop a template for institutional precedent recording and related online calculators.

On the other hand, recognition of formal learning outside the terms of an articulation agreement usually occurs in response to an individual student application and depends on case by case academic judgement as to the comparability of learning outcomes and assessment represented in the completed study with learning outcomes expected in the program of study. This judgement is best supported by institutional credit and precedent registers because it is likely that the same sorts of credit requests affecting similar courses and institutions will arise repeatedly.

3.6.2.2 Recognition of non-formal and informal learning for credit

There is much greater variability in practice for the recognition of prior learning from non-formal education (e.g. in-service, adult education or continuing education programs which provide some certification but are not accredited within the HESF) and informal learning such as is gained by life or work experience. Some universities actively promote these options and have developed user friendly ways to access them:

- Swinburne University,[46,47] for example, provides detailed guidance on preparing a portfolio of prior learning and provides a Learning Outcomes Audit form to assist students to provide evidence.

- Macquarie University has a complete set of policies and procedures on its website including an accessible list of examples of documentary evidence that will be asked for if credit is sought for informal or non-formal learning[48].

- James Cook University has a similar set of evidence that might be provided for recognition of prior informal learning[49].

Individual providers in Australia have moved to make the recognition of micro-credentials and non-formal learning more systematic, but most are proceeding on a case by case basis. The cost of doing case by case assessment for RPL is considerable and a disincentive for many providers, or indeed students, to engage. Stakeholder input to the contextual research for the AQF Review predicted that non-traditional learning is likely to be an increasing component of requests for RPL and does place a burden on current systems for assessment of credit and awarding of recognition.

While RPL and workplace learning are encouraged by the AQF there are no mechanisms within the Australian system to assign levels to 'non-standard' learning options, or to regulate or quality assure credit towards formal qualifications for in-service or informal learning or micro-credentials in a way that ensures national or international consistency. International efforts to underpin these approaches with more robust mechanisms are in their infancy. Scotland has a Scottish Universities RPL Network and has been working towards a National Framework for RPL[50] , and an international review of recognition of informal and formal learning was conducted by UNESCO Institute for Lifelong Learning in 2015[51]. Models for RPL often rely on a centralised platform for quality assurance for example, Quality and Qualifications Ireland[52] maintains an RPL Practitioner Network to promote good practice. Some other countries maintain registries of individual learning

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[46] https://www.swinburne.edu.au/current-students/manage-course/enrolment-timetable/credit-prior-study/

[47] https://www.swinburne.edu.au/media/swinburneeduau/current-students/docs/pdf/HE-RPL-Student-Guidelines.pdf

[48] https://www.mq.edu.au/study/admissions/recognition-of-prior-learning

[49] https://www.jcu.edu.au/students/enrolment/study-credit

[50] https://www.stir.ac.uk/media/stirling/services/academic-registry/documents/recognition-of-prior-learning-national-framework-for-scottish-higher-education.pdf

[51] https://ec.europa.eu/epale/en/resource-centre/content/global-perspectives-recognising-non-formal-and-informal-learning

[52] https://rpl-ireland.ie/

units offered by reputable but non-regulated providers that have been accredited at specified levels for specified credit[53].

There is general agreement that the best assessment of non-formal or informal learning is to actually review the student's performance and knowledge but this is difficult to do in volume because it requires academic judgements of individual cases.

Australian practice in validation of non-formal and informal learning, although patchy and given greater emphasis in some institutions than others, is on par with most international practice. Providers have indicated that more guidance on cost effective ways to assess non-formal learning would be useful.

Support for adequately assessing, validating and recognising credit for non-formal and informal learning may not be sufficiently addressed in current guidance material and, as we note in the concluding section, much could be done to facilitate sharing of good practice among providers to facilitate, quality assure and encourage its uptake. Ways to facilitate sharing of good practice across the public/private provider and university/NUHEP sectors should be encouraged.

3.6.3 National and jurisdictional websites

The main objectives of the AQFPP and the credit transfer arrangements in the HESF are to enhance student mobility across institutions and sectors, to ensure that there is increased diversity in the student population and that students who have no or incomplete experience of the higher education sector can apply their existing knowledge and skills to gaining a formal qualification. These objectives demand that information that is needed to access the system is easily understood and interpreted by lay audiences. The Course Seeker website while well placed to deliver the comprehensive information package that is required does not yet fulfil that role.

3.6.3.1 Information provided on Course Seeker

Course Seeker is a national admissions hub website established in an attempt to improve the transparency and consistency of information on admissions provided for potential students. Course Seeker is however, silent on the issues of alternative entry pathways and credit recognition. Although the Course Seeker Glossary[54] defines Advanced Standing, Credit Transfer and Recognition of Prior Learning there is no other mention of these terms on the site. Addition of such a section to the Course Seeker hub would be a significant improvement to assist potential students to better understand the opportunities that might be available to them through the providers' websites and the various admissions centre websites that are available in the jurisdictions.

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[53] Contextual Research for the Australian Qualifications Framework Review. Chapter 2, Section 2.6.1 .PhillipsKPA, April 2018. https://docs.education.gov.au/system/files/doc/other/aqf_contextual_research_0.pdf

[54] https://www.courseseeker.edu.au/resources/glossary

3.6.3.2 Information provided by admissions centre websites

Each state, with the exception of Tasmania, has its own tertiary admissions centre and website. ACT shares with NSW, and NT shares with South Australia. At the moment these websites are not consistent in their coverage of the opportunities for credit recognition so that potential applicants are not easily able to make comparisons between jurisdictions. The language used, the various types of credit and to whom they apply present a complex array for potential students attempting to navigate the range of possibilities. Taken together they contribute to the apparent lack of consistency and transparency, particularly with respect to alternative pathways to higher education. This problem has been recognised in the implementation plan developed by the Admissions Transparency project[55] which requires that tertiary admission centres adopt common terminology and agreed 'information sets' as the basis for presenting information to prospective students. This commitment needs to be extended to alternative pathways admission opportunities explicitly. The current commitment seems to be aimed predominantly at secondary student applications (p.13).

The NSW/ACT Universities Admissions Centre (UAC)[56] is currently developing a solution, Advance, to address the reported "pain points" inherent in institutions' credit management lifecycles. Those points have been identified as:

- inconsistency of decisions due to complicated assessment processes and little emphasis on effectively utilising precedents
- long timelines for decisions meaning decreased student satisfaction and lost conversions.
- minimal tracking and reporting on workflow, pipeline and needs of students, success outcomes for students applying through articulation agreements.

Advance is a scalable and integrated credit management solution for institutions that provides tools and services for managing and issuing credit. The solution uses technology to increase efficiency and provide comprehensive information to administrative and academic staff in their assessment and decision-making. Advance automates the process of identifying existing rules and precedents, by displaying information about the outcomes of previous credit applications of the same or similar nature. This will allow institutions to report on and review variations in outcomes in order to audit quality and inform updates to institutional policies, procedures and practices. The development of a solution specifically for the Australian context will support standardisation of terminology nationally, including alignment with any updates to AQF terminology that may arise from the 2019 AQF Review. The Advance software is currently being developed with the first implementation due to go live in late 2020.

The Queensland Tertiary Admissions Centre (QTAC) is reportedly also working on the issue of digital transportability of credentials.

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[55] Improving the transparency of higher education admissions: Joint higher education sector and Australian Government implementation plan. June 2017

[56] Personal communication, General Manager, Marketing and Engagement, Universities Admissions Centre. September 2019.

An analysis of admissions centres' websites with a specific view towards their interactions with the Course Seeker hub and institutional websites could be beneficial. Among the options identified in the next section is a proposal for a plain English guide to credit for students modelled on a site called "Taking your Learning with You" developed by the New Zealand Qualifications Authority.

3.7   Summary of issues impacting credit recognition

There is considerable detail and consistency among the official Australian policies embodied in AQFPP, Higher Education Standards Framework (HESF) and relevant TEQSA guidance material and there is broad consensus among stakeholders in support of the principles and policies supporting credit recognition[57]. Approaches to implementation of the policies differ and are not necessarily a cause for concern when they occur within the parameters of the policy and framework but they do create the potential for a less streamlined and accessible experience for students seeking credit recognition than the AQFPP envisages and the Higher Education Standards Framework aims to provide.

Differences in approach are often explained by the culture, nature and diversity of the higher education system itself. However, legitimate differences notwithstanding, there is scope for an improved level of cross sectoral support, more explicit guidance for less experienced providers and heightened attention to compliance with some of the requirements of the HESF.

Five major issues have been identified as potential challenges for the perception and maintenance of an equitable foundation for credit arrangements for students across the higher education sector. The issues have been identified from published Australian and international reports, and interviews with stakeholders.

The five overarching issues are:

1. Lack of meaningful data to allow monitoring and evaluation of demand for or effectiveness of credit recognition.

2. Variability in credit recognition practice across the higher education sector.

3. The array of potentially confusing information about credit recognition that needs to be navigated by non-expert audiences.

4. The challenges posed by the emergence of shorter form and non-formal credentials that are not covered by the Australian Qualifications Framework.

5. The need for better pre and post enrolment support for students seeking to apply for credit.

Options were identified for addressing these issues and are summarised in Section 4. The options were condensed into an Issues and Options Paper which formed the basis for stakeholder consultation (Appendix B). Feedback from the consultation process is summarised with each option.

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[57] Contextual Research for the Australian Qualifications Framework Review. PhillipsKPA, April 2018.
https://docs.education.gov.au/system/files/doc/other/aqf_contextual_research_0.pdf

4 STAKEHOLDER FEEDBACK ON SUGGESTED OPTIONS FOR ENHANCING CREDIT RECOGNITION ARRANGEMENTS

4.1 Establish a collaborative initiative to improve transparency and benchmarking of credit recognition and RPL

A collaborative initiative was established by HESP in 2018 to improve transparency of admissions processes. That initiative resulted in the creation of the Course Seeker website and a Good Practice Note was developed by TEQSA. A similar cross-sectoral group of public and private providers and regulators could be established to extend that project by explicitly considering ways to improve transparency and facilitate benchmarking between like institutions of credit recognition and RPL. Such an initiative could have spin-off actions. For example it could:

- result in the addition of relevant material to the Course Seeker website;

- assist with the *sharing of good practice resources;*

- *encourage the formation of partnerships for sharing resources and benchmarking within like groups of providers; and/or*

- *consider the feasibility or relevance of more structured approaches such as the formation of "RPL expert practitioners' networks".*

Stakeholder feedback

Stakeholder feedback is generally supportive of this option, provided that it is based on a plan of action that can evolve over time through supplementary projects. It was suggested that a good starting point for this initiative would be the improvement of information for students with the ultimate goal of increasing awareness and enhancing students' ability to negotiate and advocate for themselves.

There is general support for opportunities to collaborate and share best practice ideas and highlight examples of positive articulation arrangements between providers and within sectors. It might also be possible to identify common themes in assessment processes such as types of documents in support of evidence and structure of the assessment cycle.

It was noted that there would be more *transparency and benchmarking would be possible between like institutions if there was more consistency in the ways that subject learning outcomes are expressed; for example, standard units for volume of learning.* The Course Seeker website could usefully link to institutions' credit rules/guidelines/ credit calculator for each course to provide increased transparency and clarity for students and could help manage expectations regarding the credit/RPL assessment process for staff and students. Caution is expressed about falling into the trap that "more information is better".

Private providers note particularly that a major concern is to develop a system of applying credit and RPL that is more efficient and effective for smaller providers. Credit and RPL processes when

done properly can be resource intensive and time consuming. Although the focus is always to ensure quality education, where greater efficiency can be found to allow easier and more streamlined processes while protecting that quality, this is a positive outcome for students as well as the institution. Private providers expressed the hope that option 1 would result in this.

Stakeholders noted that the extension of the Unique Student Identifier (USI) to higher education students and the 'Transforming the Collection of Student Information' (TCSI) initiative[58] could assist with the process of linking student credit data and ultimately supporting RPL practices with evidence and data. It was also noted however that keeping databases current risks a significant imposition on provider resources which should be avoided.

One group of providers suggested that *a single national Tertiary Admissions Centre could help facilitate determination of credit at admission although the practicality of such an approach would be limited by the variability in course content, credit policies and procedures and accreditation requirements.*

4.2 Further develop principles for recognition of non-formal and informal learning

The increasing emergence of short form and non-formal credentials that fall outside the Australian Qualifications Framework requires quality-assured approaches to RPL for non-formal and informal learning. TEQSA could develop a specific set of guidance/good practice material directed towards assessment, validation and recognition of non-formal and informal learning.

Stakeholder feedback

There is a commonly held view by both public and private providers that this area presents the greatest challenge now and into the future and that the availability of such guidance, including information about approaches to micro-credentialing would ensure greater transparency and equity for those responsible for considering RPL. At the same time caution is expressed about premature policy and governance changes in regard to micro-credentials which are new and evolving rapidly. There is a risk that premature policy changes could constrain innovation.

Stakeholders are unified in the view that the main objective in assessing credit for non-formal learning is to ensure that actual capabilities and skills can be assessed rather than descriptions of length or content of experience. The involvement of industry in assisting with certification of skills is likely to be a necessary component.

It was noted that quality assurance and growing maturity of the sector in handing RPL will be needed to allow evidence - based policy. It was also pointed out that "learner maturity" is required to be able to recognise which of their previous experience is likely to be relevant to future study and that this requires some support from institutions.

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[58] https://heimshelp.education.gov.au/resources/TCSI

Several providers suggested necessary components that should be included in any principles for recognition of non-formal learning. These suggested components are summarised in Appendix C.

4.3 Provide support for improving data collection at the institutional level

Data collection and use for understanding the effect of credit provided on student performance and ways to improve approaches to credit recognition is required by the HESF. Available evidence suggests that collection of such data at institution level is patchy across the sector.

A TEQSA Good Practice Note on data collection and performance monitoring for credit recognition practices in line with the standards relating to monitoring, review and improvement (Standards 1.3 and 5.3) would be useful.

Stakeholder feedback

There is general support for this option as long as it allows for the fact that institutions have different needs and performance measures for credit monitoring. Another area of caution was emphasised that relates to avoiding data collection requirements that produce too onerous a burden on providers and detract from delivery of student services. Support for efficient and effective means to collect more data would be welcome. One peak stakeholder group recommended that any Guidance Note should incorporate existing data sources where possible to use that data more efficiently and avoid placing further administrative burden on the sector.

Exemplars on how institutions might streamline data collection at an institutional and sector level in order to report more consistently on standards 1.3 and 5.3 in particular would be helpful. A consistent approach to data collection would also inform a more consistent and reliable approach to the processes and practices used in awarding credit to students.

The need for institution-level mechanisms for transparency and monitoring of credit and RPL is acknowledged as well as the need for sufficient granularity in systems used to track student performance following application of credit/RPL and to ensure that credit/RPL decisions are well informed and do not negatively impact on student experience or outcomes. Such data can also assist in development of support mechanisms and/or review of credit/RPL awarded.

Some stakeholders cite a particular concern where credit/RPL is given for lower level qualifications, for example VET sector qualifications, into a bachelors degree. A gap in content knowledge as well as lack of appropriate academic skills and understanding of expectations is sometimes evident when students 'skip' foundational experiences.

4.4 Create a 'Student's Guide to Recognition of Learning' web page

The HESF and the AQFPP both require a proactive approach by providers to promoting, explaining and awarding credit for prior learning. Implementation of these requirements appears to be patchy across the higher education sector and more could be done by some providers to improve

the value add of the information provided. However, at a national level improvement is also possible. A web page could be added to the Course Seeker website to provide for students a plain English guide to credit application and processes. It would not pre-empt providers' sites but would provide general information leaving room for institutional variation within the overall standards. A good model is the New Zealand Qualifications Authority web page[59] devoted to recognising learning for credit. This page contains a link to a plain English guide called "Taking your learning with you – a student's guide to recognition of learning". The site is organised according to simple questions such as:

- What is RPL?

- How do I find out if my skills and knowledge can get me credit?

- What evidence and documents do I need?

- How is my previous learning going to be assessed?

- What should I do if I do not get the credit I am seeking?

Stakeholder feedback

It was generally agreed that a link with information on the credit application process on the Course Seeker website would be beneficial. The Students' Guide could also be an excellent opportunity to explain that assessment of credit, often on a case by case basis is employed to ensure students are not disadvantaged and to maximise their likelihood of success.

The plain English students' guide is supported as a useful tool for students that should be kept simple, general and developed in consultation with the sector. Care should be exercised to ensure that unreasonable expectations are not encouraged and that it is clear that approaches differ across the sector and assessment is appropriately taken on a case by case basis. Caution was also expressed about the need to bring information together rather than proliferate different sources of information. Links from the site to individual institutions should be easily accessed and the site should clearly direct students to the relevant institution for discussion of credit options.

One stakeholder group pointed to the need to frame both the discussion of credit recognition and information for students in terms of 'how can a person get the best outcome from a qualification by learning from it while avoiding unneeded duplication?' rather than 'how can a person maximise credit?' This would suggest a question in addition to the New Zealand example: 'do I want credit?'

4.5   Review TEQSA Guidance Notes

TEQSA has an ongoing program of review for its guidance notes and good practice notes. It identifies opportunities in response to its observations of risk in its interactions with providers and the system. It is currently considering new guidance on cohort analysis and admissions processes. In general TEQSA produces guidance notes in relation to its regulatory role to expand on and

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[59] https://www.nzqa.govt.nz/qualifications-standards/recognising-learning/

explain the standards framework. Good practice notes are intended as supportive advice rather than regulatory advice.

TEQSA's role in relation to non-self-accrediting providers allows it to observe areas, particularly relevant to course accreditation, where additional advice on good practice may be useful.

Stakeholder feedback

While noting the risks of unnecessary proliferation of materials and detail, providers are generally supportive of the role that TEQSA guidance notes and good practice notes can play, particularly for smaller and newer providers. On the other hand it is important to recognise that within the parameters of the HESF higher education providers are free to set their own institutional policies. That caveat notwithstanding the independent sector emphasises the need for clarity about the relationship between the standards and TEQSA's guidance – review of TEQSA's guidance would be helpful in this regard.

TEQSA guidance notes undergo a cycle of review with new issues arising from TEQSA's regulatory work as well as new opportunities to assist the sector in implementation of the Standards.

Some suggestions for further clarification or new resources were offered:

- The TEQSA Guidance Note on Work-Integrated Learning (WIL) could provide more consideration of the links between WIL and RPL.

- The glossary of terms should be updated and be consistent with other updates to the AQF following the AQF Review.

- TEQSA Guidance Notes could be developed on:

  - best practice when developing/reviewing/implementing credit for prior learning policy and operational procedures and process with attention also to the granting of "proper" and "improper" credit. The need for guidance on distinguishing between credit transfer arrangements and RPL was also identified.

  - specific issues impacting non-school leavers, for example, how recent should the studies underlying credit or RPL be?

  - exit awards and credit, for example, a student commences a 3 year Bachelors with 1 year of credit and seeks to exit in year 1 with a Diploma.

  - recognition of micro-credentialing.

4.6 Clarify the relationship between the AQF Qualifications Pathways Policy and the HESF

The Higher Education Standards Framework provides the statutory underpinning for the AQF Pathways Policy[60] (AQFPP). Each has its own explanatory material: explanatory notes for RPL and

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[60] https://www.aqf.edu.au/sites/aqf/files/aqf_pathways_jan2013.pdf

credit recognition for the AQFPP[61] and TEQSA Guidance Note on Credit and RPL[62] for the HESF. The presentation of this package of Policy, Standards and guidance material could be better integrated to facilitate providers' understanding of the inter-relatedness of the materials and their overall purpose.

Stakeholder feedback

There is general support for this suggestion noting that the present situation creates potential for inconsistencies and that integration is desirable, perhaps in the form of a simplified overview and executive summary aimed at a non-expert audience.

One stakeholder expressed the need for clarity around "what is guidance, what is regulation and what is a resource".

One stakeholder response suggested that it would be useful to post a one page document on the TEQSA website advising of the overall purpose of the AQF Policy, the TEQSA Act in relation to credit/RPL and the Higher Education Standards Framework and Guidance notes on Credit and Recognition of Prior Learning, as it is not clear how they work together .

4.7   Review Standard 7.3 of the Higher Education Standards Framework (HESF).

Standard 7.3 of the HESF is a detailed list of the required inclusions in a repository of publicly-available current information about the provider's operations. Currently the list of specifications does not include information about articulation arrangements and agreements.

Stakeholder feedback

There is some agreement with this suggestion in the interest of ensuring that the list of required publicly available information is complete. However, there is a strong caveat that there should be no prescription of the level of detail that should be provided, only that providers should refer to the existence of articulation agreements (or not) with links to whatever details can be made available on the institution's website.

Universities Australia indicated that it is unable to support this option without more detail on precisely what information providers would be required to publish and in what format and signalled the need for further consultation to identify the benefits and explore confidentiality and legal implications.

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[61] https://www.aqf.edu.au/aqf-second-edition-january-2013#aqf-explanations

[62] https://www.teqsa.gov.au/for-providers/resources/guidance-note-credit-and-recognition-prior-learning

Author's note – The Universities Australia concerns possibly reflect the fact that this Option was insufficiently clarified in the Issues and Options paper. It was intended only to emphasise Item 7.2 (2a) of the Standards cited below by inclusion of the existence of such credit arrangements in Item 7.3 (1).

7.2 Information for prospective and current students

2. *Information for students is available prior to acceptance of an offer, written in plain English where practicable, accompanied by an explanation of any technical or specialised terms, and includes:*

   a. **information to assist in decisions about** *courses* **or** *units of study, including the course design, prerequisites, assumed knowledge, when and where courses/units are offered, application dates,* **arrangements for recognition of prior learning, standing credit transfer arrangements***, pathways to employment and eligibility for registration to practise where applicable*

7.3 Information Management

1. *There is a repository of publicly-available current information about the higher education provider's operations that includes:*

   The proposal would be to add "articulation arrangements" as an additional dot point perhaps after

   j. arrangements with other parties to deliver courses of study or to conduct research training

5 CONCLUSIONS AND RECOMMENDATIONS

5.1 Conclusions

5.1.1 The regulatory framework

- Stakeholder feedback and international comparisons indicate that the current regulatory framework is capable of delivering an equitable foundation for credit arrangements for students across the higher education sector to the extent that it is coherent, detailed and clear in its objectives and standards.

- Stakeholders are quite clear in the view that any proposed changes to the present system or guidance must preserve institutional autonomy, add value, and be "administratively ergonomic" (meaning resource conserving). There is clear opposition to any initiative that would seek to infringe institutional autonomy or impede the appropriate employment of expert academic judgement in making decisions about credit. These key principles are important to safeguarding the quality and reputation of Australian higher education. Just as importantly, they are vital to ensuring that credit recognition and RPL are implemented appropriately in a way that does not disadvantage students.

- There is a strong view across the public and private providers in the sector that the best safeguard to ensure that credit levels are equitable and appropriate rests in the academic governance of the institutions and the relevant accrediting authorities.

- The Ithaca report noted (p. 22) that "providers do not generally use reference to the AQF as a tool for assessing credit". While this may not be important in practice it does nevertheless suggest that the relationship between the AQFPP and the HESF and their related materials should be made explicit, particularly with respect to the AQFPP Explanatory Notes and the TEQSA Guidance Materials which should be seen to be seamless and mutually reinforcing. Stakeholders' comments reinforce the desirability of this level of integration. While the statutory relationship between the two is obvious to policy makers, at the academic unit level the most pressing issue is deciding which set of guidelines to choose from apparently similar sets of documents.

- There is no support for any approach that would lead to mandating the amount of credit that one qualification should be given towards another or the amount of recognition that should be given for particular forms of prior learning. Differences in approach to credit recognition are evident in the sector and can often be explained by the culture, nature and diversity of the higher education system itself. There are valid educational reasons for variation in the amount of credit and recognition that is given. One peak body summarised the general view that uniformity of practice should not be the objective of improving credit practice nor would uniformity be necessary or helpful in increasing the take up of credit recognition and recognition of prior learning (RPL). It is possible to achieve improvements, that do not disadvantage students or

pose a risk to quality, whilst maintaining the institutional diversity that is a strength of the higher education sector.

5.1.2 Support for students

- Stakeholder feedback suggests that the overriding objective of any proposed action is to put students at the centre of credit recognition and to provide sufficient information and support to allow them to take an active role in understanding and providing evidence of the credit that they might reasonably expect.

- One provider group volunteered the view that after decades of development the systems are in place for credit recognition but few students seem aware of that fact. This group advocated the need for a major information initiative highlighting that:

    - qualifications can link together, with people increasingly acquiring multiple qualifications and often across VET and HE (in both directions)

    - students do not need to repeat previous learning and experience when there is no demonstrable educational necessity.

5.1.3 Support for providers

While there is a consistent desire across the sector to maintain institutional autonomy and diversity in decision making for admissions and for credit there is also a recognition that there are benefits in having shared supporting material and simplified and succinct overview documents that signal the policy directions and expectations and facilitate the work of course coordinators and credit decision makers.

There is also willingness to consider shared material and databases that could ensure greater transparency, access and equity for students. There is scope for an improved level of cross sectoral support and more explicit guidance particularly for less experienced or smaller providers.

Support for adequately assessing, validating and recognising credit for non-formal and informal learning is not sufficiently addressed in current guidance material and there is agreement that guidance material to facilitate sharing of good practice among providers across the public/private provider and university/NUHEP sectors would be beneficial. The AQF Review has also noted the need for further attention to the implications of increasing activity in shorter form credentials and non-formal and informal learning[63].

5.2 Recommendations

The consultation process did not involve a formal survey and so it is not possible to define how representative the views expressed were. However, all major stakeholder groups except for students were represented at the roundtable discussion convened at the Department of Education offices in Canberra and there was a high level of general agreement as to possible future actions that could be beneficial. Some of these recommendations will involve more work than others and

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[63] Review of the Australian Qualifications Framework, Final report, 2019, Chapters 4 and 5.

there is the potential to place a greater burden on TEQSA in particular than is reasonable. The recommendations therefore represent a range of suggestions that can be taken up in the HESP and TEQSA work programs in ways that those bodies determine to be most appropriate.

5.2.1 Revisit the Admissions Transparency process to improve transparency for alternative admissions and pathways, including extension of the Course Seeker website and provision of a 'Student's Guide to Recognition of Learning' web page

A collaborative initiative was established by the Government in 2018 in response to the HESP's recommendations to improve the transparency of admissions processes. There was widespread support for an extension to that initiative to consider ways to improve transparency and effectiveness of alternative admissions" and credit recognition practices. Such a process would also emphasise to the sector the importance of credit recognition and compliance with the relevant sections of the AQFPP and the HESF. Stakeholder feedback is generally supportive of this option, provided that it is based on a plan of action that can evolve over time through supplementary projects.

Recommendation 1:

The Higher Education Standards Panel should revisit the recent Admissions Transparency process with the specific purpose of encompassing "alternative admissions" and pathways and developing an implementation plan for improving transparency of credit recognition and assessment principles for non-formal and informal learning.

Recommendation 2:

The process for developing an implementation plan for transparency of alternative admissions and pathways (see Recommendation 1) should include at least the following actions:

- The Course Seeker website should be reviewed and revised.

- A 'Student's Guide to Recognition of Learning' web page (see New Zealand example 64) should be developed with the ultimate goal of increasing awareness and enhancing students' ability to negotiate and advocate for themselves. Linkages to provider websites would provide increased transparency and clarity for students and could help manage expectations regarding the credit/RPL assessment process for staff and students.

- A review of the "ecology" of jurisdiction level and national tertiary admissions websites is desirable to ensure that navigation from central to institutional web resources is simple and that explanations of alternative entry and credit pathways are easily accessed and understood by lay readers. This could supplement the current work on information sets and admissions transparency.

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[64] https://www.nzqa.govt.nz/qualifications-standards/recognising-learning/

5.2.2 Review supporting and advisory material to facilitate cross sector improvement in credit recognition practice

It is clear that HESP and TEQSA have engaged in considerable work in relation to explaining the standards and requirements for quality assurance of credit recognition. Nevertheless, this project has identified a number of opportunities for enhancing the effectiveness of supporting material. It should be noted that if the recommendations of the AQF Review are accepted close liaison with the groups charged with redeveloping the Credit Recognition and Pathways components will be required[65]. The consultation document asked stakeholders for suggestions as to areas in which further guidance would be useful. Stakeholders provided lists of principles for consideration in guidance notes dealing with credit recognition and suggested areas of particular difficulty in non-formal and informal learning. These are incorporated in the recommendations below and additional suggestions are listed without comment in Appendix C.

Recommendation 3:

As part of its required formative evaluation of the sector's compliance with enhanced admissions transparency commitments[66] by March 2020, TEQSA should be charged also with paying specific attention to providers' approaches to information about alternative admissions pathways and opportunities for credit recognition. This would complement effectively the requirement (p.15 of the Plan) that TEQSA advise HESP on "recommendations to government on the need for further reforms to embed greater transparency in provider admission policies and processes."

Recommendation 4:

In its regular review of its guidance materials TEQSA should consider ways to ensure that advisory resources are targeted towards providing more support for non-university or smaller, newer higher education providers whose experience in credit recognition may be still developing. Specific foci for attention were suggested by stakeholders:

- The TEQSA Guidance Note on Credit Recognition and RPL could be revised (or a good practice note devised) to incorporate the following:
    - qualification of Section 2.1.10 of the AQFPP to emphasise that it is an example, not a directive or baseline for credit awarded for certain levels;
    - examples illustrative of multi-directional credit transfer for example from higher to lower levels of the AQF;
    - addition to the list of risks inherent in credit recognition the risk to the student's time and resources of under-awarding credit or unduly discouraging use of credit by imposition of onerous conditions;

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[65] Review of the Australian Qualifications Framework Final report, 2019 (Chapters 4 and 5) https://docs-edu.govcms.gov.au/system/files/doc/other/aqf_review_2019_0.pdf

[66] Improving the transparency of higher education admissions: Joint higher education sector and Australian Government implementation plan. June 2017.

- the desirability of counselling students with respect to the possibility of supplementing credit given with bridging or enabling courses;

- discussion of the complexities of credit coupled with exit awards.

- A Good Practice Note on Principles for Recognition of Non-formal and Informal Learning would be useful to the whole sector. Any such note should incorporate explicit attention to relevant outcomes of the AQF review and ensure congruence of terminology. The aim of such a note would be to formalise the process and principles of recognition of non-formal/informal learning without prescribing amounts of credit. If supported by guidance on good practice networks of universities and higher education providers could contribute to progressive evolution of national support such as assessment tools, repositories of information and expert assessor networks. Appendix C provides suggested areas of need for guidance in recognition of prior informal or non-formal learning.

- A Good Practice Note on data collection and performance monitoring for credit recognition practices could be useful and could provide the needed incentive to improve data collection at institutional level. Specifically, such a note would remind institutions of the HESF requirement to maintain institution level records. To enable continuous improvement institutions need data on numbers of credit applications, type of credit awarded, numbers of unsuccessful applications, reasons for denial of credit and cohort analysis of results for students who are awarded credit to ensure their learning outcomes are not systematically different from student cohorts who have not been awarded credit. Such a good practice note could give more emphasis to the requirements of Standards relating to Monitoring, Review and Improvement (5.3) and Orientation and Progression (1.3) in the context of credit arrangements as well as Credit and Recognition of Prior Learning (1.2).

- The TEQSA Application Guide for course accreditation and renewal of course accreditation[67], 'Appendix B Course proposal- required elements', could place greater emphasis on opportunities for students to seek credit recognition on entry to a course. The current checklist requires "exit pathways, articulation arrangements, pathways for further learning" but is silent on the need for providers to offer opportunities to seek credit for prior learning.

- The TEQSA Guidance Note on Work-Integrated Learning (WIL) could provide more consideration of the links between WIL and RPL.

- Supplementary Good Practice Notes or templates could be developed with a view to providing more support to those non-self-accrediting higher education providers who have less history of case precedent for determining credit and insufficient infrastructure to facilitate sophisticated communication and benchmarking strategies. Topics that are likely to be most useful in these circumstances are:

- developing/reviewing/implementing policy and operational procedures and process for managing credit for prior learning

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[67] https://www.teqsa.gov.au/sites/default/files/applicationguide_courseaccredreaccred3.11.pdf?v=1507676288

- assessing credit for non-formal and informal learning including inventories of examples of types of evidence and assessments

- checklists to make it easier for providers to quality assure themselves

- examples of data sets for recording and reporting the progress of students given credit exemptions

- examples of precedent databases or credit registers to facilitate credit assessment and benchmarking

- examples of model websites and model student information tools such as credit calculators.

5.2.3 Clarify the relationship between the AQF Pathways Policy and the HESF

The current documentation and information underpinning policies and standards for credit recognition, while comprehensive, has been developed over time in response to the needs and objectives at the day. Clarifying the relationship would be timely given the current review of the AQF.

The needs of both students and institutions could be better served by reviewing the presentation of this documentation so that it is designed and presented as a package with specific target audiences in mind. Providers who are trying to comply with the policy and the standards relating to credit recognition should have available to them a "one stop shop" that explains what the policy and the standards mean and require in terms of evidence and documentation for accreditation and registration. Stakeholders have suggested that a single page on the TEQSA website written for a non-expert audience would be sufficient to achieve integration.

Recommendation 5:

Reference to the AQF Pathways Policy (or its successor post the AQF review) should be considered for addition to Standard 1.2 of the Higher Education Standards Framework and should be incorporated into the explanatory material supporting the relevant in order to emphasise that the two are complementary rather than competing sets of documents.

5.2.4 Require information about articulation arrangements and agreements in HESF Section 7 Representation, Information and Information Management

Standard 7.3 Information Management provides a comprehensive list of the required inclusions in a repository of publicly - available current information about the provider's operations. Information about articulation arrangements and agreements, although mentioned in other parts of Section 7 (7.2, 2a) is missing from the list of specifications in Standard 7.3. Absence of articulation agreements and credit recognition from the list means that it is potentially absent from the providers' checklists when they are developing their material to comply with Section 7. It is only necessary to add the term "articulation arrangements and agreements and credit arrangements" to the list of information already specified. There is no expectation that further

detail is required in the Standard itself. This would simply serve as a reminder to institutions of the need to provide information on their websites about the existence or not of such agreements. Most already do so.

Recommendation 6:

Subject to further consultation to explore confidentiality and legal implications, Standard 7.3 should be reviewed to ensure that it specifies inclusion of articulation arrangements and agreements and credit recognition arrangements in a repository of publicly - available current information about the provider's operations.

APPENDIX A – PROVIDER WEBSITES REVIEWED

UNIVERSITY PROVIDERS

Australian Catholic University

Australian National University

Canberra Institute of Technology

Central Queensland University

Charles Darwin University

Charles Sturt University

Curtin University

Deakin University

Federation University Australia

Griffith University

James Cook University

Macquarie University

Monash University

Murdoch University

Notre Dame University

Queensland University of Technology

Royal Melbourne Institute of Technology

Southern Cross University

Swinburne University

Torrens university

University of Adelaide

University of Melbourne

University of Newcastle

University of New England

University of New South Wales

University of Queensland

University of South Australia

University of Southern Queensland

University of Sunshine Coast

University of Sydney

University of Tasmania

University of Technology Sydney

University of Western Australia

University of Wollongong

Victoria University

Western Sydney University

NON-UNIVERSITY PROVIDERS

Academies Australasia Polytechnic

Australian College of Applied Psychology

Career Education Association of Victoria Institute

Endeavour College of Natural Therapies

Holmesglen

International College of Hotel Management

International Education Association of Australia

Kings Own Institute

Navitas

Partners in Training Australia

Skyline International College

TAFE International Western Australia

Think Education

TOP Education Institute

Open Universities Australia

Whitehouse Institute of Design

APPENDIX B – CONSULTATION DOCUMENT

PhillipsKPA is preparing a report for the Department of Education to support consideration of issues by the Higher Education Standards Panel (HESP). The report will examine the extent to which current regulation provides – or is capable of delivering – an equitable foundation for credit arrangements for students across the higher education sector.

Specifically, the project will:

1. Assess the effectiveness of the current regulatory framework to encourage and facilitate access to academic credit and manage the assessment and awarding of academic credit to higher education students.

2. Identify the extent to which higher education stakeholders consider a consistent, common or complementary approach to the offer, assessment and awarding of academic credit is needed in higher education – consistent with the requirements in the Higher Educations Standards and the Australian Qualification Framework (AQF) Qualifications Pathways Policy (AQFPP).

3. Identify the range of policy or guidance material that would be necessary to ensure higher education providers are aware of and equipped to deliver the expectations of the Standards and any future AQF credit-related policy to the maximum benefit of students.

ISSUES

There is considerable detail and consistency among the official Australian policies embodied in AQFPP, Higher Education Standards Framework (HESF) and relevant TEQSA guidance material and there is broad consensus in support of the principles and policies supporting credit recognition.[68] The most recent, targeted and comprehensive research on the state of credit recognition is the Ithaca Group Report for Department of Education and Training in 2018[69]. After extensive research across the VET and higher education sectors the Ithaca Group's findings provide the baseline for this project. Despite the existence of a considerable level of detailed information and guidance, the Ithaca study described differences among providers' interpretations of the policies and guidance material and their approaches to implementation. Consequently, there is the potential for a less streamlined and accessible experience for students seeking credit recognition than the AQFPP envisages and the Higher Education Standards Framework aims to provide.

Those differences are often explained by the culture, nature and diversity of the higher education system itself. However, legitimate differences notwithstanding, there is scope for an improved

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[68] Contextual Research for the Australian Qualifications Framework Review. PhillipsKPA, April 2018. https://docs.education.gov.au/system/files/doc/other/aqf_contextual_research_0.pdf

[69] Credit Pathways in VET and Higher Education. Research Project . Final Report to DET, Ithaca Group, 2018. https://docs.education.gov.au/system/files/doc/other/aqfcreditpathways.pdf

level of cross sectoral support, more explicit guidance for less experienced providers and heightened attention to compliance with some of the requirements of the HESF.

Five major issues have been identified as potential challenges for the perception and maintenance of an equitable foundation for credit arrangements for students across the higher education sector. The issues have been identified from published Australian and international reports, and interviews with stakeholders.

The five overarching issues are:

1. Lack of meaningful data to allow monitoring and evaluation of demand for or effectiveness of credit recognition.

2. Variability in credit recognition practice and outcomes across the higher education sector.

3. The array of potentially confusing information about credit recognition that needs to be navigated by non-expert audiences.

4. The challenges posed by the emergence of shorter form and non-formal credentials.

5. The need for better pre and post enrolment support for students seeking to apply for credit.

Following consultations with providers, students, and peak bodies we have identified a number of potential options to provide support to both students and providers and to facilitate transparent and equitable approaches to credit recognition and RPL. These options are set out below.

We would appreciate receiving your comments on these options, in particular we are interested to understand any difficulties you would envisage for your organisation if the options were to be implemented. You might also wish to suggest further options that have not been considered here.

Please send comments to: cewan@phillipskpa.com.au

by Friday September 27

OPTIONS

Option 1   Establish a collaborative initiative to improve transparency and benchmarking of credit recognition and RPL.

A collaborative initiative was established by HESP in 2018 to improve transparency of admissions processes. That initiative resulted in the creation of the Course Seeker website and a Good Practice Note was developed by TEQSA. A similar cross-sectoral group of public and private providers and regulators could be established to extend that project by explicitly considering ways to improve transparency and benchmarking of credit recognition and RPL. Such an initiative could have spin-off actions. For example it could:

- result in the addition of relevant material to the Course Seeker website;
- assist with the *sharing of good practice resources and benchmarking;*
- *encourage the formation of partnerships for sharing resources and benchmarking within like groups of providers; and/or*
- *consider the feasibility or relevance of more structured approaches such as the formation of "RPL expert practitioners' networks".*

1. Would such an initiative be useful?

Option 2   Further develop principles for recognition of non-formal and informal learning.

The increasing emergence of short form and non-formal credentials that fall outside the Australian Qualifications Framework requires quality-assured approaches to RPL for non-formal and informal learning. TEQSA could develop a specific set of guidance/good practice material directed towards assessment, validation and recognition of non-formal and informal learning.

2. What information or support could be particularly useful in your context?

Option 3   Provide support for improving data collection at the institutional level.

Data collection and use for understanding the effect of credit provided on student performance and ways to improve approaches to credit recognitions is required by the HESF. Available evidence suggests that collection of such data at institution level is patchy across the sector.

3. How could this be improved?

Would a Good Practice Note on data collection and performance monitoring for credit recognition practices aligned with the standards relating to monitoring, review and improvement (Standards 1.3 and 5.3) be helpful?

Option 4   Create a 'Student's Guide to Recognition of Learning' web page.

The HESF and the AQFPP both require a proactive approach by providers to promoting, explaining and awarding credit for prior learning. Implementation of these requirements appears to be patchy across the higher education sector and more could be done by some providers to improve the consistency of approaches. However, at a national level improvement is also possible. A web page could be added to the Course Seeker website to provide for students a plain English guide to credit application and processes. It would not pre-empt providers' sites but would provide general information leaving room for institutional variation within the overall standards. A good model is

the New Zealand Qualifications Authority web page[70] devoted to recognising learning for credit. This page contains a link to a plain English guide called "Taking your learning with you – a student's guide to recognition of learning". The site is organised according to simple questions such as:

- What is RPL?

- How do I find out if my skills and knowledge can get me credit?

- What evidence and documents do I need?

- How is my previous learning going to be assessed?

- What should I do if I do not get the credit I am seeking?

4. Should Australia design a similar link for inclusion in the Course Seeker website?

Option 5   Review TEQSA Guidance Notes.

The Ithaca report and other research suggests that implementation of all the requirements with respect to credit recognition that are expressed in both the AQFPP and the HESF is patchy. One approach to support better implementation is to review the comprehensiveness of the TEQSA Guidance Notes.

5. Aside from the suggestions in Options 2 and 3 above are there other areas in which TEQSA Guidance Notes could be useful?

Option 6   Clarify the relationship between the AQF Qualifications Pathways Policy and the HESF.

The Higher Education Standards Framework provides the statutory underpinning for the AQF Qualifications Pathways Policy[71] (AQFPP). Each has its own explanatory material: explanatory notes for RPL and credit recognition for the AQFPP[72] and TEQSA Guidance Note on Credit and RPL[73] for the HESF. The presentation of this package of Policy, Standards and guidance material could be better integrated to facilitate providers' understanding of the inter-relatedness of the materials and their overall purpose.

6. Would this be a useful outcome?

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[70] https://www.nzqa.govt.nz/qualifications-standards/recognising-learning/

[71] https://www.aqf.edu.au/sites/aqf/files/aqf_pathways_jan2013.pdf

[72] https://www.aqf.edu.au/aqf-second-edition-january-2013#aqf-explanations

[73] https://www.teqsa.gov.au/for-providers/resources/guidance-note-credit-and-recognition-prior-learning

Option 7   Revise Standard 7.3 of the Higher Education Standards Framework (HESF).

Standard 7.3 of the HESF is a detailed list of the required inclusions in a repository of publicly-available current information about the provider's operations. Currently the list of specifications does not include information about articulation arrangements and agreements.

> 7.   Should Standard 7.3 be revised to incorporate a requirement that information about articulation arrangements be publicly available?

APPENDIX C – ITEMS FOR CONSIDERATION IN DEVELOPMENT OF BEST PRACTICE NOTES OR GUIDES

Best practice principles for credit recognition management[74]

- Published policies, systems and governance procedures for managing RPL and credit transfer arrangements. These policies and procedures should incorporate:

  - clear statement of the evidence required when requests for credit are assessed;

  - designation of the group or office responsible for coordinating and recording credit recognition decisions;

  - explicit statement on the institution's stance on what will and will not be accepted for credit recognition, including qualification types that will not be considered;

  - systems and data sets to record and provide on request the necessary evidence for decisions made;

  - regular reporting to the academic governing body on the performance of cohorts of students admitted with various forms of credit;

  - designated office or officers at institutional and/or academic unit level who are expert in credit recognition issues and can act as a point of reference for both staff and students.

- Arrangements for assessing learning outcomes for award of credit should ensure that:

  - credit assessment is made on the basis of equivalence of learning outcomes, volume of learning, content (depth and breadth) and learning and assessment approaches that validly assess learning objectives.

  - the prior learning is current and relevant to the learning outcomes of the course for which credit is sought;

  - the integrity or achievement of course of study outcomes or discipline or professional accreditation requirements is not adversely affected by the granting of credit;

  - decisions are evidence-based and transparent

  - mechanisms are in place to ensure that the verification of learning outcomes is quality assured.

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[74] Compiled from stakeholder feedback and literature review.

- Arrangements must be specified for external moderation and benchmarking of credit recognition processes and outcomes as well as internal quality audit and review.

- Information about pathways for students, potential students and advisers must be available prior to enrolment and published on the website and through admissions centres. Information must incorporate:
  - enough information to ensure that student expectations of entitlement to credit are reasonable and well informed;
  - explanation of the amount and type of credit potentially available;
  - mechanisms or tools (e.g. credit calculators, dedicated phone lines) for advice and support in determining whether and how to apply for credit;
  - clear statements of learning or qualification types that will not be considered for credit and examples of previous types of credit granted;
  - advice on avenues for appeal on credit decisions in the form of a specified office or officer of the academic unit or institution.

- Evidence of processes in place to evaluate and report on whether credit recognition policies are working through analysis of student cohorts from different pathways progressing towards and achieving course learning outcomes and other indicators of performance (for example, retention, progression, completion, GPA average and graduate destination/performance).

Suggested areas of need for guidance in recognition of prior informal or non-formal learning[75]

Guidance would be useful on:

- the type of learning to be assessed, classification principles and related standards for assessment and recognition
- guidance on the types of evidence to demonstrate experience and learning and verification of evidence requirements
- guidance on volume of learning
- assessment principles and identification of best practice
- principles of recognition and credit award
- minimum requirements in order to be an assessor of RPL
- validation guidelines/process
- minimum requirements to award RPL, e.g. 75-100% of content needs to be covered off

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[75] Compiled from stakeholders' written responses.

- links/information to any relevant policies and legislation (federal and state) which need to be consulted /adhered to when determining recognition for non - formal and informal learning.

- approaches to standardisation of micro-credentials e.g. the Professional Practice credentials pioneered by Deakin[76]

- optimal ways of dealing with complex combinations of prior experience and its relevance

- good practice in monitoring and validation of precedent application

- the role of industry partners in validating RPL

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[76] https://www.deakin.edu.au/credentials

APPENDIX D – SAMPLE OF CONDITIONS IMPOSED BY TEQSA ON REGISTRATION DECISIONS THAT ARE RELATED TO CREDIT AND RECOGNITION OF PRIOR LEARNING

These sample conditions were provided by the TEQSA Compliance and Investigations team.

Sample 1

Institution X must:

a) by 21 July 2018 provide TEQSA with a report containing a comprehensive diagnostic analysis of the probable causes for observed rates and trends for grade distributions and student attrition, progression and minimum time completion rates, for each accredited higher education course it offers, for the period from 2012 to 2016 inclusive. The report must also include analysis by:

   i. entry path (comparing students admitted under each entry pathway);

   ii. recognition of credit (comparing students admitted without recognition of prior credit to students admitted with credit for up to a third of the course and up to half of the course);

   iii. referral to and uptake of student support;

   iv. student achievement (including attrition, progression, completion and grade distribution) in similar courses at other higher education providers.

b) by 21 July 2018 provide TEQSA with a detailed strategy, having regard to the report at (a), which:

   i. includes specific targets for improvement of student attrition, completion and progress rates for each course;

   ii. gives consideration to admission practices and standards, the identification of students at risk of not progressing academically, and the adequacy and effectiveness of student support mechanisms.

c) include evidence of the consideration of the report at (a), and the approval of the strategy at (b), by XXX's Academic Senate, when the report and the strategy are provided to TEQSA.

d) include evidence of the steps taken to implement the strategy at (b), together with a report on the effectiveness of the strategy, in XXX's next renewal of registration application.

Sample 2

Institution X must:

a) by 21 July 2018 provide TEQSA with a report containing a comprehensive diagnostic analysis of the probable causes for observed rates and trends for grade distributions and student attrition, progression and minimum time completion rates, for each accredited higher education course it offers, for the period from 2012 to 2016 inclusive. The report must also include analysis by:

    i. entry path (comparing students admitted under each entry pathway);

    ii. **recognition of credit (comparing students admitted without recognition of prior credit to students admitted with credit for up to a third of the course and up to half of the course);**

    iii. referral to and uptake of student support;

    iv. student achievement (including attrition, progression, completion and grade distribution) in similar courses at other higher education providers.

b) by 21 July 2018 provide TEQSA with a detailed strategy, having regard to the report at (a), which:

    i. includes specific targets for improvement of student attrition, completion and progress rates for each course;

    ii. gives consideration to admission practices and standards, the identification of students at risk of not progressing academically, and the adequacy and effectiveness of student support mechanisms.

c) include evidence of the consideration of the report at (a), and the approval of the strategy at (b), by XXX's Academic Senate, when the report and the strategy are provided to TEQSA.

d) include evidence of the steps taken to implement the strategy at (b), together with a report on the effectiveness of the strategy, in XXX's next renewal of registration application.

Sample 3

Institution X must:

Within 28 days of the date on the Notice of Decision, XXX must provide TEQSA with evidence demonstrating the implementation of its Credit Transfer Policy. XXX's response should show the number of students who have been awarded credit into its higher education degrees, the subjects for which credit has been given and the institution at which the student previously studied, and the credit points allocated. Data covering a period of two years should be provided.

Sample 4

Institution X must:

Provide evidence to TEQSA that accurate information is available to prospective and current students:

a) by 1 November 2014:

- o revised information to reflect the changes made during the reviews including the descriptions of the course content, structure, sequence and delivery in both standard and block modes.

- o information for domestic and international students about **internal articulation** from XXX Pty Ltd's VET Diplomas to XXX Pty Ltd's Bachelor degrees

b) by 31 December 2014:

- o 2015 Prospectus/Handbook for domestic and international students with a summary of changes made.

Sample 5

Institution X is required to provide the following to TEQSA by 30 October 2014:

a) Evidence of formal **credit and recognition of prior learning agreements** with higher education providers publically listed on its website; and

b) The removal of any references to education partnerships on the XXX website, which are no longer current or are not supported by formal agreements.

Sample 6

By 30 October 2014, XXX is required to revise and provide evidence of **Recognition of Prior Learning and Credit Transfer Policy in line with the AQF Pathways Policy**, specifying maximum levels of credit available for each AQF level, using the descriptors of the AQF and specifying circumstances where RPL is available, such as 33 per cent credit for a diploma linked to a three year bachelor degree.

Sample 7

Institution X must provide:

a) by 31 January 2015, evidence that all persons who make decisions **regarding admission and recognition of credit** have documented delegated authority to make these decisions.

b) by 31 July 2015, evidence that its financial and managerial delegations documented in its Delegations Policy are observed and regularly reviewed.

Sample 8

By 30 December each year (starting in 2018 and for the duration of accreditation) provide to TEQSA in relation to each student granted credit into the Bachelor of Business (Leadership and Management) course information which describes:

a) **the units for credit/ RPL has been granted**

b) **the previous study or professional experience that formed the basis for the granting of credit, and**

c) **how previous study or professional experience was mapped against the outcomes for those units for which credit was granted.**

Sample 9

X Pty Ltd must, prior to delivery of the courses, review its proposed **internal credit arrangements** and its articulation agreement with YYY to demonstrate how they **protect the integrity of the Associate Degree and the Bachelor Degree** and provide a copy of this review to TEQSA. The review is to include:

a) **on what basis credit can be granted** for the subjects ISY102 Introduction to Business Information Systems and ISY212 Management Information Systems when they are not studied in the current Bachelor Degrees; and

b) a demonstration of how XXX has **determined equivalence** between the VET diploma subjects and the second year subjects — specifically how the VET diploma outcomes, skills and knowledge demonstrate the second year learning outcomes and whether the assessment of VET subjects and the second year subjects is equivalent.

Sample 10

By 30 September 2017 XXX Pty Ltd to provide **RPL and credit transfer procedures** for the Master of XXXX (benchmarked against comparable courses at other providers) that ensure that students admitted to the degree on the basis of RPL have the required level of background skills and knowledge to position them to achieve the course learning outcomes.

Sample 11

Articulation and credit arrangements

X to provide by 30 July 2018:

a) copies of agreements for **credit transfer arrangements** and articulation pathways to further learning with its university partners for X's Associate Degree courses.

b) information for students of X's credit transfer arrangements which specify the eligibility for acceptance into another course of study and the amount of credit available towards a Bachelor Degree with specific university partners

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