

Australian Catholic University

Feedback to the Department of Education, Skills and Employment

Proposed Amendments to the *Higher Education Standards Framework (Threshold Standards) 2015* regarding Academic Credit Recognition Arrangements

September 2020

Feedback on Proposed Changes to the Higher Education Standards Framework on Academic Credit Recognition Arrangements

Australian Catholic University (ACU) welcomes the opportunity to provide comment on the proposed amendments to the *Higher Education Standards Framework (Threshold Standards) 2015* (“Standards”), with respect to academic credit recognition arrangements.

ACU provides the following feedback on the proposed changes to the Standards.

Standard 1.2 - Credit and Recognition of Prior Learning

The amendments propose to include, with respect to assessing prior learning under Standard 1.2, reference to a “credit and recognition of prior learning framework” within the *Australian Qualifications Framework* (AQF), for the purposes of determining whether to grant credit for units of study within a course of study or toward the completion of a qualification. However, this implies there is a framework on credit and recognition of prior learning (RPL) within the AQF framework, which could cause confusion.

ACU recommends the proposed wording be modified to reference the *AQF Qualifications Pathways Policy*, which sets out the relevant principles for assessing credit and RPL. The following revision is recommended for the purposes of clarity:

Standard 1.2 Credit and Recognition of Prior Learning

1. Assessment of prior learning is undertaken for the purpose of granting credit for units of study within a course of study or toward the completion of a qualification, **consistent with the credit and recognition of prior learning policy framework within the Australian Qualifications Framework AQF Qualifications Pathways Policy**. Such assessment is conducted according to institutional policies, the result is recorded and students receive timely written advice of the outcome.

Alternatively, if the preference is to not single out a specific policy under the AQF, a more general reference could be made to “policy”, rather than to a “framework”, as per below:

1. Assessment of prior learning is undertaken for the purpose of granting credit for units of study within a course of study or toward the completion of a qualification, **consistent with the credit and recognition of prior learning policy framework within the Australian Qualifications Framework**. Such assessment is conducted according to institutional policies, the result is recorded and students receive timely written advice of the outcome.

Standard 7.3 - Information Management

The amendments propose an additional provision under Standard 7.3 be included to require higher education providers to provide, at course level, details or explanation of “how standards are assured in any articulation arrangements or credit agreements which the course may be subject to” (7.3.2(g)).

ACU recommends new guidance notes be prepared to provide further details on what is required under this provision (as well as the other revisions to the Standards more broadly), to assist higher education providers to comply. Fundamentally, implementation should be practicable.

ACU also seeks advice on whether compliance with 7.3.2(g) would be demonstrated if, at course level, direction to the relevant institutional policy which addresses how standards are assured is provided in any articulation arrangements or credit agreements.

If more granular information is required at course level, ACU stresses that providers must be afforded adequate time to demonstrate compliance with the new Standards.

Mapping and detailing all articulation arrangements and credit agreements is a highly complex exercise. Furthermore, it is important to recognise that while considerations of equivalency between institutions or specific units and documentation of pathways is at course level, RPL and credit decisions relate to the student (which then forms a precedent to apply to other students who may have the same experience). Thus, RPL more broadly is very complex and may even be unique to individual students.

ACU looks forward to receiving further advice and clear guidance on the proposed new requirements under the Standards.