

24 November 2011

Senator the Hon Chris Evans  
Minister for Tertiary Education, Skills, Jobs and Workplace Relations  
Parliament House  
PARKES ACT 2600  
[teqsa@deewr.gov.au](mailto:teqsa@deewr.gov.au)

Dear Senator Evans

Thank you for the opportunity to provide further comment on the draft Qualification Standards and the Provider Standards to be created under the *Tertiary Education Quality and Standards Agency Act 2011*.

Both sets of standards have been subject to considerable discussion through review of the Australian Qualifications Framework, leading to its renewal earlier in 2011, and consultations on transforming the Protocols governing State based registration of higher education providers into national standards. The IRU has made comments previously about particular aspects of the draft Standards. The major need now is not for further amendments but a response to the framing issues concerning the Qualification Standards.

### ***Qualification Standards***

In our previous comments the IRU looked for clarity about the relationship between the Qualification Standards and the Australian Qualifications Framework (AQF).

The AQF affects higher education, vocational education and school education. It is approved by Ministers at both Commonwealth and State and Territory level. The Qualification Standards at different points refer to the AQF, replicate the AQF, and provide a variant on the AQF. This leaves open considerable space for confusion and the potential for contradictory requirements without much vigilance to ensure the two documents retain the intended synchronicity.

Hence it would be very useful to understand the rationale for the variable approaches to the AQF with reference to:

- listing out each AQF approved HE qualification such that any change requires amendment to both documents. One reason for reworking the AQF over the past three years is to make changes in the nature and number of qualifications easier through setting them against an underlying levels structure;

- use of 'award' predominantly in place of 'qualification', the term used throughout the AQF; and
- the creation of two sets of credit transfer principles with considerable overlap as well as distinctive elements in each.

A particular issue is the standing of the transition provisions between the previous version of the AQF and the current as set out in the published AQF at p 101. This states that all requirements of the AQF will be met from 1 January 2015. The provision allows universities, and other providers, time to implement changes to qualifications in the updating of the AQF. *To address this, the IRU recommends that the Qualification Standards explicitly refer to the implementation arrangements in Section 1.*

### ***Provider Qualifications***

The draft of the Provider Qualifications is a positive response to the suggested improvements which universities made to the earlier drafts.

The IRU emphasises the importance of the requirement (point ten in each case) that approval of a new university (of all types) is subject to the support of the relevant Commonwealth, State and Territory Government. This ensures that the question of whether a new university is a useful outcome is considered. The Standards also make clear that a provider should have demonstrated over at least five years its capacity for self accreditation before being approved as an Australian University or an Australian University of Specialisation.

Yours sincerely



Conor King  
Executive Director