Guidance Note: *Credit and Recognition of Prior Learning*

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What do Credit and RPL Encompass?

'Credit' is a benefit provided to a student by waiving one or more of the normal requirements for completion of a course of study, such as not having to complete a particular unit of study. Credit is obtained on the basis of evidence that the student has already undertaken learning that is deemed to be equivalent to the parts of the course of study for which credit has been granted. For the purposes of this Guidance Note, credit is interpreted broadly to include:

- specified and unspecified credit

- exemptions

- advanced standing

- credit transfers

- opportunities for substitute learning

- other similar outcomes.

'Recognition of Prior Learning' (RPL) is defined in the Australian Qualifications Framework as a *process* through which eligibility for the award of credit is assessed, through assessment of formal, informal and non-formal learning.

This process is grounded in evidence-based academic judgement about equivalence of learning. The requirements for making such judgements will be reflected in institutional policies, processes and practices concerning RPL. In practice, RPL may result in overarching standing credit transfer arrangements with other providers. For example, two providers reach an agreement that if a student has already completed course 'x' at provider 'y', a prescribed amount of credit will normally be offered into a course at the other provider. Aside from such standing arrangements, credit may be granted to individual students on a case-by-case basis. Whether or not credit is granted, an RPL process must culminate in a formal notification of the outcome to the student(s) concerned and an organisational record of the decision.

In other contexts, RPL may be referred to as assessment only of informal learning.

Relevant Standards in the HES Framework

The Standards in Part A of the *Higher Education Standards Framework (Threshold Standards) 2015* (HES Framework) address Credit and RPL specifically in Domain 1

(Student Participation and Attainment) at Section 1.2 (Credit and Recognition of Prior Learning). From a process standpoint, these Standards require that:

▸ assessment for RPL is undertaken

▸ there are institutional polices for doing so

▸ those policies are followed

▸ the results of RPL assessments are recorded

▸ students are informed of the outcome through timely written advice.

The award of credit also has implications for meeting the requirements of many other Standards beyond those in Section 1.2. The Standards for Admission require that admitted students have no known limitations that would be expected to impede their progression or completion (Section 1.1). The Standards for Orientation and Progression require that students have equivalent opportunities for successful transition into and through their course of study, irrespective of their educational background or entry pathway (Standard 1.3.6). The Standards for Learning Outcomes require that, on completion, students have demonstrated that they have achieved the specified learning outcomes for their course of study (Standard 1.4.4), as encompassed by Standards 1.4.1 & 1.4.2. The Standards for Qualifications and Certification require that all credit granted is identified in a student's record of results (Standard 1.5.7b), and in a graduation statement (1.5.8) if one is issued. The Standards for Monitoring, Review and Improvement (Section 5.3) require the use of data on student progress to inform, *inter alia*, admissions requirements (Standard 5.3.7), which may include the award of credit through RPL. The Standards for Course Design (Section 3.1) also relate to the award of credit, particularly those concerning requirements to engage with advanced learning consistent with the level of study involved (Standard 3.1.2) and those concerned with coherence of achievement of learning outcomes (Standard 3.1.3). The Standards for Corporate Monitoring and Accountability (Section 6.2) require that qualifications are awarded legitimately (Standard 6.2.1h), which may encompass the legitimate award of credit towards a qualification. Providers are also required to provide public access to their arrangements for RPL, including any standing credit transfer arrangements with other providers (Standard 7.2.2a).

Intent of the Standards

The intent of the Standards is to support the award of credit, but only where warranted, and in accordance with defined institutional policies and processes (see Standard 1.2.1). The overall principles for the award of credit contain two overarching elements – avoiding potential disadvantage for students and maintenance of the integrity of the course of study and its qualification, as set out in Standard 1.2.2:

1.2.2 Credit through recognition of prior learning is granted *only* if:

  a. students granted such credit are not disadvantaged in achieving the expected learning outcomes for the course of study or qualification, and

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

The intent of Standard 1.2.2a is to require a provider to have processes to determine whether students could be academically disadvantaged or otherwise disadvantaged in their proposed course of study by an award of credit. In other words, providers are expected to evaluate the consequences of awarding credit before doing so. This means there are mechanisms to inform RPL processes of the needs of individual students and/or cohorts in the context of their course of study. This will involve academic judgement, together with a practical appreciation of the requirements of the students' specific course of study and the nature of the institution.

Standard 1.2.2b concerns the potential impact of awarding credit on the integrity of a course of study and its qualification. The intent of the HES Framework overall is that a course of study represents a coherent whole and it is delivered at a level consistent with the level of study and outcomes involved (see e.g. Sections 1.4 Learning Outcomes and 3.1 Course Design). Deleting part of a course through the award of inappropriate credit potentially detracts from that coherency, and from the student's ability to achieve the overall course learning outcomes. The Standards recognise that academic judgement is critical in determining whether the award of credit is a risk to a student's learning experience and outcomes. Such judgement is necessary, whether at an organisational level (e.g. in agreeing to standard credit transfer arrangements with another institution) or in considering the evidence provided by individual students on a case-by-case basis. The Standards also place an onus on the provider to act in the interests of students who may not be in a position to appreciate the impact of receiving credit beyond the immediate perceived benefit of a reduction in workload.

Section 1.2 collectively presupposes that a provider has the level of academic competence that is necessary to make evidence-based academic judgements. The preceding section indicates the many other Standards other than those in Section 1.2 may need to be considered in making such academic judgements.

Risks to Quality

As discussed, awarding unwarranted or inappropriate credit can lead to a range of adverse outcomes which are outlined in more detail below.

Academic disadvantage: While the award of credit may be well intentioned and indeed welcomed by the students concerned, it may still be unwarranted, excessive or inappropriate and lead to consequent academic disadvantage to students especially in the case of students unfamiliar with higher education. Specifically:

- students may find that their prior learning does not in fact fit well with the design and level of preparedness needed for their chosen course of study, for example their prior learning may be:

  - out of date

  - not consistent with the Australian Qualifications Framework (AQF) level involved

- lacking in necessary foundations of learning (e.g. oriented towards skills and competencies without sufficient underpinning in relevant principles).

- students who have missed out on parts of a course may require additional learning support of a type that is not readily available for the current course of study.

Process failures: Failures of process are likely, at least, to result in student dissatisfaction, if not academic disadvantage as well, specifically:

- Credit or RPL policies may not be fit for purpose or effective, or those who implement the policies may not be sufficiently informed, rigorous or evidence-based in their approach

- the scope, depth or learning outcomes of prior learning may not be scrutinised sufficiently in RPL processes

- students may have inappropriate expectations about eligibility for credit because of insufficient access to timely accurate information or information and practices may be inconsistent

- providers may not distinguish sufficiently between potential eligibility for credit (subject to a process) and automatic eligibility for credit through a transfer arrangement, thus raising false expectations or confusion

- tardiness in decision making may force students to incur inconvenience and costs in preparing for parts of a course of study for which they belatedly get credit.

Loss of course/qualification integrity: An inappropriate award of credit poses risks to the integrity of a course of study and, consequently, the quality and reputation of the qualification awarded, specifically:

- prior learning may not have engaged with advanced knowledge and enquiry at a level consistent with the level of qualification involved, or the expected learning outcomes

- learning outcomes that would otherwise have been required to be demonstrated may not be demonstrated as a consequence of RPL, leading to uncertainty of graduate outcomes

- the assessments associated with prior learning may not be able to demonstrate the achievement of learning outcomes appropriate to the current course of study

- prior learning may have been carried out in an environment that would not meet the relevant requirements of the HES Framework for a course of study and cannot be assured

- a course of study may be weakened if excessive credit is granted for lower AQF levels of learning e.g. granting credit for a block of Level 6 learning in a Level 8 course of study

- assessment standards might be lowered to accommodate students who were admitted but lacked sufficient preparedness for undertaking the course.

What TEQSA will look for

This part of the guidance note covers the full extent of the Standards, and corresponding evidence that TEQSA may require, in relation to Credit and RPL.

For new applicants seeking initial registration and course accreditation, TEQSA will require evidence to be provided in relation to all relevant Standards.

For existing providers, the scope of Standards to be assessed and the evidence required for particular applications may vary. This is consistent with the regulatory principles in the TEQSA Act, under which TEQSA has discretion to vary the scope of its assessments and the related evidence required. In exercising this discretion, TEQSA will be guided by the provider's regulatory history, its risk profile and its track record in delivering high quality higher education.

TEQSA's case managers will discuss with providers the scope of assessments and evidence required well ahead of the due date for submitting an application.

The evidence required for particular types of application is available from the Application Guides on the TEQSA website.

Providers are required to comply with the Standards at all times, not just at the time of application, and TEQSA may seek evidence of compliance at other times if a risk of non-compliance is identified.

Providers are required to comply with the Standards at all times, not just at the time of application, and TEQSA may seek evidence of compliance at other times if a risk of non-compliance is identified. In the first instance TEQSA will need to be satisfied that a provider has a credible RPL process that meets the requirements of Standard 1.2.1. TEQSA will need to see that RPL and the award of credit are guided by an organisational policy(ies) and that the policy:

- addresses the requirements of the HES Framework

- is fit-for-purpose

- is likely to be effective.

A provider will need to demonstrate that students have access to information about the provider's policies and practices and what students need to do to seek credit, including credit through RPL, and any critical deadlines. It will also be necessary to demonstrate that:

- RPL and credit processes and practices are actually implemented in accordance with policies

- students receive timely formal written notice of RPL assessments

- decisions concerning the award of credit are recorded correctly as part of a student's individual record

- decisions made on the award of credit and RPL are consistent.

TEQSA will also need to be satisfied in relation to the requirements of Standard 1.2.2, i.e. that students are not disadvantaged by an award of credit and that the award of credit does not degrade either the course of study or the qualification awarded, whether for an individual student or overall. In so doing, a provider will need to demonstrate that decisions in relation to the award of credit, whether for development of institutional policy and processes, creating standing arrangements for credit transfer or in making individual assessments, are informed

by competent academic judgements and processes that are consistent with the level of study and learning outcomes involved.

Further, a provider will also need to demonstrate that the award of credit maintains the integrity and level of the course of study, including being consistent with the requirements of the AQF for that level of study. In particular, TEQSA will not accept the award of credit that materially weakens a course of study if credit is granted for material from lower AQF levels or material that was not credibly assessed as being at the the level of the course award. TEQSA will expect this to be precluded by both policy and practice.

TEQSA may also draw on records of complaints (see e.g. see Standard 7.3.3c) as evidence of the effectiveness of a provider's RPL processes.

Where 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.

TEQSA may also seek evidence that assessment standards are being maintained so that assessments by the end of the course are capable of confirming that all specified learning course outcomes have been achieved (Standard 1.4.4) and that grades awarded reflect the level of student attainment (Standard 1.4.3).

Resources and references

Australian Qualifications Framework Council (2013), *Australian Qualifications Framework Second Edition January 2013,* <http://www.aqf.edu.au/>.

TEQSA (2016), *Explanations of terms in Part A of the HES Framework 2015*, <http://www.teqsa.gov.au/explanations-hes-framework-terms>.

Version #	Date	Key changes
1.0	23 October 2017	Made available as beta version for consultation.