

TEQSA

TEQSA and the Australian Qualifications Framework

Questions and answers

Effective from 1 January 2017

Providers should note that Guidance Notes are intended to provide guidance only. They are not definitive or binding documents. Nor are they prescriptive. The definitive instruments for regulatory purposes remain the TEQSA Act and the Higher Education Standards Framework as amended from time to time.

What is TEQSA's role in relation to the AQF?

The Australian Qualifications Framework (AQF) is a national policy document that includes overarching specifications for regulated qualifications in Australia. TEQSA has regard to the specifications and guidelines throughout the AQF.

TEQSA's role is to register all higher education providers and ensure that providers and their courses continue to meet the *Higher Education Standards Framework (Threshold Standards) 2015* (HES Framework). TEQSA applies the Standards in Part A of the HES Framework in the context of three regulatory principles: reflecting risk, regulatory necessity and proportionate regulation (section 13 of the *Tertiary Education Quality and Standards Agency Act 2011* [TEQSA Act]¹). All of TEQSA's regulatory activities must comply with these three principles.

The HES Framework includes the requirement that the learning outcomes of all higher education qualifications at Levels 5-10 of the AQF must be consistent with the level of the course, which TEQSA will assess against the corresponding specifications for levels in the AQF. TEQSA will also take into consideration the relevant qualification type descriptors in the AQF.

The first of these requirements is located in Section 1.4 of the HES Framework on Learning Outcomes and Assessment:

'1.4.1. The expected learning outcomes for each course of study are specified, consistent with the level and field of education of the qualification awarded, and informed by national and international comparators'.

The second requirement is located in Section 1.5 on Qualifications and Certification:

'1.5.3. When an Australian Higher Education Qualification is offered, the course of study leading to the qualification is either self-accredited under authority to self-accredit or accredited by TEQSA and the learning outcomes for the qualification are consistent with the level classification for that qualification in the Australian Qualifications Framework'.

¹ The complete TEQSA Act is available from: https://www.legislation.gov.au





A further requirement is located in Section 3.1 on Course Design:

- '3.1.2. The content and learning activities of each course of study engage with advanced knowledge and inquiry consistent with the level of study and the expected learning outcomes including:
 - a. Current knowledge and scholarship in relevant academic disciplines
 - b. Study of the underlying theoretical and conceptual frameworks of the academic disciplines or fields of education or research represented in the course, and
 - c. Emerging concepts that are informed by recent scholarship, current research findings, and, where applicable, advances in practice'.

Section 3.2 on Staffing also includes a requirement that academic staff and leaders have the qualifications and capacity needed to teach students in relation to the nature and level of expected learning outcomes (see Standard 3.2.2).

Domain 6 on Governance and Accountability includes the requirement that academic leadership must be consistent with the levels of higher education offered.

TEQSA does not determine the content of the AQF.

Stakeholders who wish to suggest amendments to the AQF should direct their suggestions to the Australian Government Department of Education and Training (see http://www.aqf.edu.au/aqf-governance/current-arrangements/).

Stakeholders who wish to suggest amendments to the HES Framework should direct these to the Higher Education Standards Panel.

How does TEQSA assess whether the learning outcomes of a course are at the appropriate AQF level?

To assess whether the expected learning outcomes for a course meet the AQF level, TEQSA:

- compares the expected course learning outcomes with the specified learning outcomes for the relevant AQF level
- assesses whether the design of all components of the course support achievement of the course's learning outcomes as a whole.

TEQSA will also ascertain how effectively the course is designed to assess whether students will have achieved the course learning outcomes by the end of the course.

TEQSA may call on external academic discipline experts to assist in reviewing courses for course accreditation and re-accreditation applications from providers without Self-Accrediting Authority. TEQSA amy also consult with or take account of the observations of professional accrediting authorities where relevant.





How much flexibility do providers have in assigning titles to AQF qualifications?

TEQSA will review qualification titles to ensure they accurately represent the nature of the course and particularly the qualification type, as required by Standard 7.1.1 in the HES Framework, with reference also to the AQF Qualifications Issuance Policy², which states that 'qualifications will have titles that unambiguously identify each qualification type, level and field of study/discipline'. For example, the title 'Advanced Master of X' is potentially misleading, implying that the qualification is of a type and level higher than Level 9. By contrast, it would be acceptable to use the title 'Master of X (Advanced)'. However, providers would need to demonstrate that the course content was in some way more advanced than in other courses that do not have this designation.

Can Bachelor Honours Degrees be awarded solely on the basis of merit?

The AQF Level 8 criterion specifies that graduates will have advanced knowledge and skills for professional/highly skilled work and/or further learning. TEQSA assesses courses of study designated as honours-level courses through evidence that the course design, learning activities and assessment requirements are consistent with the Level 8 learning outcomes.

The past practice of awarding degrees with honours based only on meritorious performance (e.g. grade point average or weighted average mark) within a Bachelor Degree without evidence of additional honours-level study is no longer supported under the AQF or the HES Framework. A student cannot be awarded honours after completing the same course of study as a student who graduates with a pass degree.

Under the AQF, Bachelor Honours Degrees are achievable either as part of an integrated course of study with embedded Level 8 honours components (e.g. a 4-year Bachelor Degree with an embedded Level 8 component) or as a separate honours year with Level 8 learning outcomes following a three-year Level 7 Bachelor Degree.

Can undergraduate units be included within a Graduate Diploma?

The AQF Level 8 criteria require graduates of a Graduate Diploma to have 'advanced knowledge and skills for professional /highly skilled work and/or further learning'.

It is doubtful if advanced knowledge at Level 8 could be developed within a one-year Graduate Diploma if the diploma made significant use of units from a Level 7 Bachelor Degree without adaptation, although one or two units from a Bachelor Degree could be included where they provide valid foundations as an introduction to Level 8 studies. It is more likely that some units from a Bachelor Honours Degree could be suitable for use within a Graduate Diploma, as both of these qualifications are at Level 8, however, this would be assessed by TEQSA on a case-by-case basis.

² See http://www.agf.edu.au/





For any given Graduate Diploma, TEQSA will assess whether the course as a whole meets the specifications for Level 8 and whether the course enables students to achieve Level 8 learning outcomes by the end of the course.

How much research should there be in Masters Degree (Coursework) courses?

The Level 9 Specification criteria in the AQF include the following requirements:

- 'Graduates at this level will have specialised knowledge and/or skills for research, and/or professional practice and/or further learning', and
- 'Graduates will have expert, specialised cognitive and technical skills in a body of knowledge or practice to independently:... research and apply established theories to a body of knowledge of practice'.

The descriptors for all qualification types at Level 9 require students to have knowledge of research principles and methods.

To meet these requirements and those of the HES Framework, a Masters Degree (Coursework) should include some form of learning activity that develops knowledge of research methods and principles appropriate to the discipline, field of work, or professional practice.

Learning activities to develop research skills would typically include one of the following:

- a research-based project
- a capstone experience and/or
- a piece of scholarship.

These three types of activities can be alternatives.

A Masters Degree (Research) by definition requires the planning and execution of a project that includes a substantial piece of research which makes a contribution to knowledge. By contrast, a Masters Degree (Coursework) does not require a graduate to make a contribution to knowledge.

Whilst this Note specifies the minimum elements of 'research' in a Masters by coursework (see above), this does not preclude individual providers including greater components of research such as independent research projects or the like.

How much flexibility is there in the volume of learning requirements for various types of Masters Degrees?

TEQSA will expect the learning outcomes of any course to be achievable by most students within the duration specified for the course, and assessed at the required level.

TEQSA will have regard to the volume of learning guidelines for particular qualification types in the AQF as reference points.





Where applicants are proposing a volume of learning substantially lower than those specified in the AQF qualification type descriptors, they should present an academically defensible case to the accrediting body (TEQSA, or their own course-approval body if they have Self-Accrediting Authority), citing credible reference points. Other reference points could include international comparators.

TEQSA will pay particular attention to the interaction between the volume of learning and the level of assessment tasks. *The level of assessment tasks should not be lowered to facilitate a shorter course duration.*

The amount of time students require to complete a postgraduate course should be related to the level of their prior learning overall, and specifically to the level of prior learning in the relevant discipline. Admission requirements and volume of learning are inter-related in these cases and should take varying amounts of prior learning in different cohorts of applicants into account. Students with no background in the required discipline will need to undertake additional subjects introducing them to the discipline, which is likely to lead to the longer indicative durations in Table 1.

Particular issues can arise in relation to Masters Degrees (Coursework) in business fields, including the Master of Business Administration (MBA). It is common for substantial business experience to be one of the entry requirements into the MBA, substituting, to some extent, for formal qualifications. Providers need to consider the extent to which substantial business experience can be regarded as equivalent to experience in the academic discipline, in order to justify a shorter volume of learning (for example one year instead of two years).

The issue here is whether applicants returning to study (or with no background in the discipline) will be able to achieve the course learning outcomes in the course duration, including acquisition of 'advanced and integrated understanding of a complex body of knowledge in one or more disciplines or areas of practice'.

Similar issues would apply in the case of Masters Degrees (Coursework) principally designed for professional conversion (for example a Master of Teaching or a Master of Accounting, for students with a Bachelor Degree in any field).

It may be more academically defensible to enrol students without prior experience in the academic discipline in a Level 8 qualification first, and allow them to articulate into the Masters Degree (Coursework) after demonstrating their ability to progress to achieving learning outcomes appropriate for a Masters Degree.

The volume of learning guidelines for Masters Degree (Coursework) in the AQF are summarised in Table 1 in Appendix A, for ready reference. In view of the myriad of possibilities, TEQSA will consider proposals on a case-by-case basis.

Credit, RPL and volume of learning

Prior learning (formal or informal) can be used either:

- to support admission into a course where the applicant does not have the standard criteria for admission, or
- for applicants who have met the standard criteria for admission, to support exemption form the need to complete some components of the course.

TEQSA does not expect that the same recognition of prior learning (RPL) would be used both for entry and for credit exemptions. Providers will need to ensure that where prior learning is used as a pathway into any course of study, the policies and course documents





specify the extent to which prior learning can be used to gain admission into, or as contributing to credit (and therefore a shorter volume of learning) within, the course of study.

The underlying principle, however, must still be observed; all students should have a sufficient basis of prior knowledge and skills to achieve the course learning outcomes and the learning outcomes for the AQF level in the time specified. This needs to be ascertained at the point of admission.

TEQSA acknowedges that there are relationships between volume of learning and course duration that arise from differing models of participation. For example a course could be taught across three trimesters per year or in semesters for a longer period. Providers need to take care to present their models of delivery and participation accurately; to be clear to students and for CRICOS purposes for international students.

When will changes to meet AQF specifications have consequences for CRICOS?

Part C, Section 7 of the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007³ (National Code) states that registering a course on CRICOS must include the expected duration of the course and 'the designated authority must take into account the proposed course structure when determining the appropriate duration for registration on CRICOS'.

In accordance with the National Code, any changes to the registered duration of a course must be approved by TEQSA prior to the changes being made.

Whilst ELICOS and Foundation Programs are non-AQF courses, TEQSA also has regulatory responsibility for CRICOS registration of Foundation Programs and ELICOS courses linked to higher education programs. TEQSA will assess these courses against the relevant standards under the ESOS Act:

- ELICOS National Standards
- Foundation Standards⁴.

What is TEQSA's role in assessing other courses for non-AQF qualifications?

Standard 1.5.9 in the HES Framework provides that:

'Qualifications that do not align with a qualification that is recognised in the Australian Qualifications Framework are not described using the nomenclature of the Australian Qualifications Framework or implied to be a qualification recognised in the Australian Qualifications Framework'.

TEQSA will not assess courses that lead to non-AQF awards.

³ The National Code was under review at the time of updating these FAQs.

⁴ The ELICOS National Standards and Foundation Standards are available from: https://www.legislation.gov.au





Can academic staff teach in a course if they do not have a qualification at least one AQF level higher than that of the course?

TEQSA will check that academic staff are appropriately qualified in the relevant discipline to at least one level higher than the AQF qualification level being taught, or that they have equivalent professional experience, as required in Standard 3.2.3 of the HES Framework. This is to ensure that the provider has the appropriate academic staff profile to ensure students receive a quality learning experience in a higher education environment. Consideration of the teaching staff will be done on a case-by-case basis, as TEQSA recognises that there are various combinations of qualifications and experience which would meet the requirements of the Standard.

There are four elements considered by TEQSA in assessing the suitability of the teaching staff for a particular course of study:

- qualifications and experience
- knowledge of contemporary developments in the discipline or field, informed by scholarship or research
- skills in teaching, learning and assessment relevant to the discipline
- relevance of the discipline.

If providers are relying to some extent on equivalent professional experience, this experience must be relevant to the course of study being taught and be equivalent to the required qualification level and specifications in the AQF. The provider should have a policy framework underpinning its approach to assessing equivalence.

Please note that Standard 3.2.4 requires that teachers who teach specialised components of a course and who do not fully meet Standard 3.2.3 'have their teaching guided and overseen by staff who meet the Standard'. This might, for example, include tutors and higher degree students who are gaining teaching experience, or experienced practitioners.

For further detail, please refer to TEQSA's Guidance Note on determining equivalence of professional experience and academic qualifications.

How will TEQSA interact with professional bodies and registration boards when assessing the same course?

In cases where both TEQSA and professional bodies are assessing the same course within the same timeframe, there are benefits for all parties in collaborating. TEQSA has been working with a number of professional bodies and its approach is under development. For more information, refer to the TEQSA website: http://teqsa.gov.au/regulatory-approach/engagement-with-professional-bodies>.

Such interactions could be beneficial:

- 1) to reduce duplication of activities and therefore reduce the regulatory burden on providers; and
- 2) to ensure a consistent and aligned approach to regulation and accreditation i.e. TEQSA





and professional accrediting bodies talk to each other and share relevant information. Examples could include sharing of experts for course assessment, sharing of documentation or reports etc.

TEQSA welcomes higher education providers to submit professional accreditation and other external review reports of its courses as part of applications for renewal of course accreditation and registration, as evidence of effective self-regulation and expert input. TEQSA also notes that a TEQSA accreditation of an institution may provide information on which a professional body may rely, even if not specific to a particular program e.g. evidence of effective institutional corporate and academic governence. TEQSA also acknowledges that TEQSA's work and the work of professional bodies have different levels of focus (institutional vs program) and purposes (regualtion against the HES Framework vs e.g. public safety within the National Law for health professions). ⁵

TEQSA welcomes the diversity of educational delivery across the sector and acknowledges that its Guidance Notes may not encompass all of the circumstances seen in the sector. TEQSA also recognises that the requirements of the HESF can be met in different ways according to the circumstances of the provider. Provided the requirements of the HESF are met, TEQSA will not prescribe how they are met. If in doubt, please consult your TEQSA case manager.

Version #	Date	Key changes
1.0	February 2013	
2.0	30 May 2014	Updated for volume of learning revisions in the AQF for Masters Degrees.
3.0	10 November 2016	Updated for the HESF 2015 and made available as beta version for consultation.
3.1	5 April 2019	Incorporation of consultation feedback.

⁵ The Higher Education Standards Panel is considering the development of a Code of Practice for Professional Accreditation in Australian Higher Education, to further encourage the streamlining of accreditation processes.





Appendix A

Summary Table 1 – Masters Degree (Coursework) volume of learning guidelines

Previous Learning (Academic years)	Length of Masters (Academic years = 1 EFTSL)
Related Discipline	
Bachelor Honours Degree/Degree with Honours	1 year
4-year Bachelor Degree	1 year or 1.5 years*
3-year Bachelor Degree	1.5 years or 2 years*
Different discipline	
Bachelor Honours Degree/Degree with Honours	1.5 years
4-year Bachelor Degree	1.5 year or 2 years*
3-year Bachelor Degree	2 years

^{*} Duration determined by entry requirements, structure and purpose of the Masters Degree, and demonstrated achievement of Masters-level outcomes.