

Victorian TAFE  
*Association*



Response

Stage 2 AQF Council project:

*Developing and Implementing a  
Common Terminology for Credit  
Transfer and Articulation  
February 2009*

Victorian TAFE Association  
Level 3, 478 Albert Street  
East Melbourne, Victoria, Australia  
March, 2009

## VICTORIAN TAFE ASSOCIATION RESPONSE

### DEVELOPING AND IMPLEMENTING A COMMON TERMINOLOGY FOR CREDIT TRANSFER AND ARTICULATION

#### DRAFT POLICY, PRINCIPLES & GUIDELINES

##### **EXECUTIVE SUMMARY**

The initiative to develop a common policy and terminology for credit arrangements across education and training sectors is applauded. The perceived benefits for learners and students are critical in ensuring clear and effective pathways between courses, sectors and providers.

The draft under consideration has taken the complexities that were explored in the 2008 discussion paper and provided a clearer and simpler approach and taxonomy that attempt to address the unique characteristics and requirements of the three sectors.

VTA supports the broad intent of the policy, principles and operational guidelines and offers specific suggestions for improvements in the commentary to follow. A key message is the need for a consistent way of measuring the value of credit and mechanisms to ensure adoption of the policy, principles and operational guidelines..

Sixteen recommendations are offered:

**Recommendation 1:** That the footnote defining the term education and training provider be imbedded in the body of the Introduction.

**Recommendation 2.:** That the paragraph in the Introduction ‘However, this policy and guidelines should not impinge upon or replace the academic integrity of study or the autonomy of individual education and training providers in making decisions on admission, prerequisites for ongoing study, and the levels and amounts of credit conferred in their courses of study’ be deleted.

**Recommendation 3:** The policy statement is developed so that it is not ambiguous and that credit is awarded based on equivalent content not on the specifics of assessment items.

**Recommendation 4:** Operational Guidelines include the opportunity for providers to refer complaints to an independent body.

**Recommendation 5:** The AQF Council explores the development of a tool to measure the value of credit, such as the Victorian Qualifications Navigator (formally the Credit Matrix) that can provide credit at the level of complexity of the learning outcomes as well as the content level.

**Recommendation 6:** The phrase *combination of all forms of credit* at the bottom of the processes cell is replaced with *combinations of all forms of recognition*.

**Recommendation 7:** The definition of RPL is changed to read ‘Recognition of Prior Learning (RPL) is an assessment process that determines the credit outcomes of an individual application for *recognition*.’

**Recommendation 8:** That the AQF Council consults further with stakeholders regarding the relevance and appropriateness of including the current definition of Exemption in the Credit Terminology Framework.

**Recommendation 9:** The third principle is amended to read ‘recognise learning regardless of how, when and where it is acquired, provided that the learning is relevant *and current* to the learning outcomes or competencies in a subject, unit, module, course or qualification.’

**Recommendation 10:** The sixth principle is amended to read ‘allow for credit outcomes to be used to meet specified prerequisites for entry into a qualification or for the partial or complete fulfilment of a qualification.’

**Recommendation 11:** The seventh principle is amended to read ‘be subject to the same rigour of quality assurance as other educational policies, procedures and processes of the education and training provider *including of external quality requirements*’.

**Recommendation 12:** AQF Council explores credit value for Certificate IV AQF qualifications.

**Recommendation 13:** Review the scope of Table 1 (page 13) to include the depth of credit arrangements between schools, VET and HE.

**Recommendation 14:** Rename Table 1 (revised) as Minimum credit values based on relativities.

**Recommendation 15:** Clause 6.3.3. (iv) to read ‘RPL assessment should meet comparable *quality standards* to other assessment for the relevant qualification components.’

**Recommendation 16:** 6.2.7 (ii) be amended to read ‘Learners moving to a new education or training institution with credit, particularly from Vocational Education and Training to a Higher Education environment, should be offered transition support *by the new institution.....*’

## **PREAMBLE**

The Victorian TAFE Association (VTA) participated in Stage 1 and welcomes the opportunity to contribute to the consultation process for Stage 2 of the AQF Council project: *Developing and Implementing a Common Terminology for Credit Transfer and Articulation*.

The initiative to develop a common policy and terminology for credit arrangements across education and training sectors is applauded. The perceived benefits for learners and students are critical in ensuring clear and effective pathways between courses, sectors and providers. The draft under consideration has taken the complexities that were explored in the 2008 discussion paper and provided a clearer and simpler approach and taxonomy that attempt to address the unique characteristics and requirements of the three sectors.

VTA members include four multi-sector Universities, fourteen stand-alone public TAFE Institutes, AMES and the Centre for Adult Education. Our members deliver training and education across the spectrum of the Australian Qualifications Framework including Senior Secondary School Certificates of Education, Vocational Certificates, Diplomas, Advanced Diplomas, Associate Degrees, Bachelor degrees and post-graduate qualifications. Delivery occurs in partnership with schools, universities, employers, peak industry bodies, governments and community organisations nationally and internationally. VTA is well placed to respond to the draft policy, principles and guidelines.

This response is made in the context of COAG's policy directions for VET and Ministerial objectives to support increased use of credit arrangements in Australia's education and training system. This response is also framed in the light of the recommendations of the Bradley Review into Higher Education 2008 and Deputy Prime Minister Gillard's announcement at the Big Skills Conference (March 5, 2009).

- a. that the Government will commission the Australian Qualifications Framework Council to improve the articulation and connectivity between the university and VET sectors to enable competency-based and merit-based systems to become more student-focused and
- b. the formation of a single tertiary education sector Ministerial Council, with representatives from all tertiary education and training systems.

The VTA in this response draws on submissions directly to the VTA from our members on this subject and on the views of Victorian TAFE providers attending a focus group convened in March 2009. VTA members may respond individually to the discussion paper to highlight areas of particular interest to their organisations.

## **THE INTRODUCTION**

It is imperative for buy-in by all education and training stakeholders that the policy is imbedded in the Australian Qualifications Framework (AQF). Imbedding in the AQF will have the flow-on effect of being articulated in providers' quality systems and operational plans. Ministerial objectives to increase use of credit arrangements in Australia's education and training systems require the universal understanding and consistent application of policy principles and guidelines. That said, it is disappointing to note in the Introduction to the policy that 'the policy guidelines should not impinge

upon or replace the academic integrity of study or the autonomy of individual education and training providers in making decisions on admission, prerequisites for ongoing study, and the levels and amounts of credit conferred in their courses of study.' This may have the unintentional effect of enabling providers to opt-out and to continue with current practices that result in inequitable awards of credit. This paragraph should be deleted or the meaning clarified.

The reader needs to understand at the outset the term 'education and training provider' within the context of this policy. While it is stated in a footnote the VTA does not believe this is explicit enough and recommends the definition be imbedded in the body of the Introduction.

**Recommendation 1:** That the footnote defining the term education and training provider be imbedded in the body of the Introduction.

**Recommendation 2:** That the paragraph in the Introduction 'However, this policy and guidelines should not impinge upon or replace the academic integrity of study or the autonomy of individual education and training providers in making decisions on admission, prerequisites for ongoing study, and the levels and amounts of credit conferred in their courses of study' be deleted.

## **OVERRIDING POLICY**

VTA supports the broad policy statement but there is need for a consistent way of measuring the value of credit.

There is a fundamental lack of understanding between the education and training sectors about the equivalence of learning between sectors and in particular between Vocational Education and Training (VET) and Higher Education (HE).

The AVCC Guidelines on Cross Sectoral Linkages<sup>1</sup> provide a guide for developing articulation arrangements between VET and HE qualifications, for example, 50% credit (1½ years) for an Advanced Diploma when linked to a three year Bachelor degree. This is not a simple judgement when universities are confronted with enquiries from graduates holding Advanced Diplomas that vary significantly in length. As examples based on Victorian Purchasing Guides for VET qualifications<sup>2</sup>:

- RII60106 Advanced Diploma in Civil Construction Management 1010 – 1600 nominal hours
- FNS60104 Advanced Diploma of Financial Services 375 – 1005 nominal hours
- CHC60302 Advanced Diploma of Community Services Work 727 – 1215 nominal hours
- CHC60202 Advanced Diploma of Children's Services 1062 – 1975 nominal hours.
- SIT60107 Advanced Diploma of Tourism 1500 – 2205 nominal hours

VET qualifications, developed by industry to meet occupational competency requirements, do not fit a neat pattern of time spent in education and training unlike

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<sup>1</sup>

[http://www.universitiesaustralia.edu.au/documents/policies\\_programs/teaching\\_learning/credit\\_transfer/AVCC\\_Guidelines.pdf](http://www.universitiesaustralia.edu.au/documents/policies_programs/teaching_learning/credit_transfer/AVCC_Guidelines.pdf)

<sup>2</sup> [http://trainingsupport.otte.vic.gov.au/p\\_trgpck.cfm?menu=2](http://trainingsupport.otte.vic.gov.au/p_trgpck.cfm?menu=2)

three year bachelor degrees that are typically 4 units per semester and 24 units over three years. From a VET perspective, Bachelor degree graduates cannot be assumed to automatically meet a level of competency in particular occupational areas by virtue of having undertaken three years of full-time study in a related discipline.

Admission to a course on the basis of prior studies or qualifications and the granting of credit for prior studies or qualification are the key indicators of educational pathways.<sup>3</sup> A lack of universal and unambiguous policy directions has led to highly variable outcomes for VET graduates applying for credit in HE courses. Anecdotal evidence provided to the VTA suggests this variability is widespread. HE providers often give different levels of credit to different TAFE institutes/RTOs for the same training package qualification. Examples have been provided where different personnel in a HE provider have made different recommendations for credit with each based on the same VET qualification.

TAFE graduates wanting to enter HE have expectations that their VET qualification will provide them with more than entry into HE courses. Yet, repeatedly TAFE graduates experience indifference when they approach higher education providers for credits into higher education based on VET qualifications. A respondent from a regional Victorian TAFE institute commented in the VTA response to the Bradley Review of Higher Education that 'there seems little drive by the higher education sector to welcome initiatives by TAFE/VET providers especially in regional areas to facilitate articulation arrangements and when they do occur or are initiated, they are slow to implement with attempts to speed up the process thwarted not by local regional campuses but by remote academic committees located in metro based universities.'

Credit decisions are frequently based on the specifics of assessment items and not equivalent content. The AQF National Policy and Guidelines on Credit Arrangements should be clear that this should not happen, rather than just talk in generalities about consistency. HE requires evidence of a suitable level of knowledge demonstrated by the learner. If problems then emerge about the different providers, this should be addressed by the regulatory authorities or an independent conciliator.

Successful articulation, and more explicitly the granting of credit between VET and higher education most frequently relies on the personal relationships between individuals than the application of consistent, systemic policies. The VTA understands the use of competency standards within Training Packages and the assessment of the achievements of competency are not deeply understood by HE selection officers. From the perspective of transfer from the VET sector to the higher education sector, the implementation of Training Packages has been said to have made the details of the learning program less transparent. It is important that there is better education available to the sectors about what constitutes competency-based learning and assessment practices to dispel the myths which have competency based learning and assessment characterised as the 'poor relation' in education and training and thus somehow a lesser learning model. Recognition of competency based assessments, recognition of prior learning and on-the-job assessments are keys to improving the credit transfer outcomes for TAFE qualified applicants to HE. HE needs to accept as equivalent, competency achievements notated on transcripts of students' results as 'Competent' or 'RPL'.

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<sup>3</sup> Long, M., 'TAFE and entry to higher education', VQA, December 2006,

VTA does not understand why the principles of mutual recognition used in the VET sector could not be used to enable consistent recognition of credit. Case studies developed by individual providers could be validated and used nationally to underpin recognition. For example;

- East Gippsland Institute of TAFE has an agreement with Monash University for credit between the VET Diploma of Children's Services and the Bachelor of Early Childhood Studies. If this agreement was validated nationally, opportunities may be available for more VET graduates in the Diploma of Children's Services to receive equivalent credit into a bachelor degree in Early Childhood Studies.
- Deakin University and Box Hill institute of TAFE have agreed to a dual qualification where the students graduate with an Advanced Diploma of Tourism and Hospitality Management and degree in Business management.
- Deakin University and Gordon TAFE have arrangements between the VET qualification in architectural drafting and the university degree in architecture.

The lack of a consistent and cross sectoral mechanism for determining equivalence of complexity is a major gap in the conceptual framework. The VTA remains to be convinced that the levels of complexity between various qualifications can be determined by their titles. Table 1 (page 13) of the draft policy includes very broad general credit proposals and implies that Diplomas and Advanced Diplomas are of similar volume of learning but in reality the volume can vary significantly. An Advanced Diploma may be a one or a two year course. A blanket expectation of 50% credit into a bachelor course may be unrealistic and not likely to be supported by a higher education provider. Similarly, a 40% credit into a Senior Secondary Certificate of Education for any AQF qualification (such as Certificate 2) may also be unrealistic.

VTA commends to the AQF Council the work of the Victorian Registration and Qualifications Authority and the report '*Credit Matrix Trial Project – Impact of the application of the Credit Matrix in the advanced standing (credit transfer) determination process between the Higher Education and TAFE sectors and on the development of concurrent programs*'. This study shows that the Credit Matrix (now known as the Qualifications Navigator) can be used to enable education and training providers to consistently measure the value of credit by assigning points to the level and complexity of learning.

The Credit Matrix 'had a positive impact on the process of developing concurrent programs... (and) provided a common framework that could be used to clearly communicate credit transfer information between the different sectors and also to students.'<sup>4</sup> The Credit Matrix has demonstrated an ability to provide credit at the level of complexity of the learning outcomes as well as the content level. The complexity of qualifications is raised in the operational guidelines (6.1.4 (iv)) and need to be explicitly stated in Section 3 Policy.

The policy needs to be strengthened if it is to deliver consistency in awarding of credit.

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<sup>4</sup> Deakin University et al, Report to the VRQA 'Credit Matrix Trial Project', January 2008, p. 19)

**Recommendation 3:** The policy statement is developed so that it is not ambiguous and that credit is awarded based on equivalent content not on the specifics of assessment items.

**Recommendation 4:** Operational Guidelines include the opportunity for providers to refer complaints to an independent body.

**Recommendation 5:** The AQF Council explores the development of a tool to measure the value of credit, such as the Victorian Qualifications Navigator (formally the Credit Matrix) that can provide credit at the level of complexity of the learning outcomes as well as the content level.

## TERMINOLOGY

While representing a departure from a current understanding of terminology for the VET sector, the diagram in section 4 of the paper is logical and clear. The separation into three sections of input, process and output (credit) provides a framework for interpreting this area which is currently characterised by local and often conflicting definitions and processes.

The inclusion of informal learning alongside non formal and formal learning is a major step forward. It may be argued that the phrase *combination of all forms of credit* at the bottom of the processes cell could be replaced with *combinations of all forms of recognition*. The word *recognition* reflects the process while the term credit refers to the outcome which is appropriate in the third cell.

The major definition changes from a VET perspective are those assigned to the terms *articulation* and *exemption*. Both new definitions will require considerable communication and promotion within the sector. The inclusion of the term *exemption* to describe a negotiated learning and assessment pathway that recognises achievement of parts of competencies or subjects, recognises existing informal arrangements in many VET courses. To date, this process has been used by many teachers who want to help their learners' fast track their courses, but there has been no way to capture the information at a formal level. Unless the draft policy also recommends changes in AVETMIS reporting the incidence of exemption will remain in the information domain of the individual teacher.

VTA notes the definition in Explanatory note 6 in section 7 states the 'minimum level for determining and granting a credit is the relevant and agreed qualification component ie credit is for a unit, a subject etc.' (page 22). This statement does not appear to accommodate the definition of 'exemption' as providing partial credit.

In addition, the short definition of RPL in section 4 needs reworking to ensure that it is clear that non-formal and informal learning are included as inputs to the process. Indeed, the transition of RPL from an umbrella term to one of the process options should be recognised as an additional change.

The concepts of block, specified and unspecified credit are unfamiliar to many in the VET sector and the idea of partial credit may not sit well in HE. A case study approach may assist in building understanding of the inherent options and opportunities.

**Recommendation 6:** The phrase *combination of all forms of credit* at the bottom of the processes cell is replaced with *combinations of all forms of recognition*.

**Recommendation 7:** The definition of RPL is changed to read 'Recognition of Prior Learning (RPL) is an assessment process that determines the credit outcomes of an individual application for *recognition*.'

**Recommendation 8:** That the AQF Council consults further with stakeholders regarding the relevance and appropriateness of including the current definition of Exemption in the Credit Terminology Framework.

## THE PRINCIPLES

The Principles are supported in general.

A key feature of credit arrangements is that the learning under consideration is relevant *and current* to the learning outcomes or competencies. While some may say that *relevant* implies currency, VTA maintains the principles must explicitly highlight this characteristic. The third principle should be amended to reflect the need for the learning to be *current* in the judgement of the conferring body.

Principle 6 appears contradictory where in one part it states that credit outcomes are allowed to be used to meet 'complete fulfilment of a qualification' (page 10) yet later in the same sentence, this is to occur within institutional guidelines that may specify 'the maximum amount of credit that may be granted for any qualifications'. The provision of credit is intended to avoid duplication of relevant previous learning. The VTA would be interested in the examples of *quality purposes* that may impose the need for limitations to be placed on the proportion of credit that can be awarded. If equivalence of content and complexity has been achieved, credit should be forthcoming. There should be no cap placed on the proportion of any AQF qualification that can be achieved by credit arrangements.

**Recommendation 9:** The third principle is amended to read 'recognise learning regardless of how, when and where it is acquired, provided that the learning is relevant *and current* to the learning outcomes or competencies in a subject, unit, module, course or qualification.'

**Recommendation 10:** The sixth principle is amended to read 'allow for credit outcomes to be used to meet specified prerequisites for entry into a qualification or for the partial or complete fulfilment of a qualification.'

**Recommendation 11:** The seventh principle is amended to read 'be subject to the same rigour of quality assurance as other educational policies, procedures and processes of the education and training provider *including of external quality requirements*'.

## THE OPERATIONAL GUIDELINES

The proposed operational guidelines are generally supported but it is disappointing that the draft operational guidelines when proposing general credit values still take a linear view of VET being feeder qualifications into HE. Credit is about movement between the three sectors: schools, VET and HE and not necessarily linear. If the

policy is to be representative of all credit options a tabular description must include credit values from HE to VET, School to VET.

For example:

**TABLE 1: Minimum credit values based on qualification relativities**

<b>AQF qualification</b>	<b>Minimum credit value</b>
Any AQF award to SSCE	
Any AQF Certificate IV linked to a ....	
AQF Diploma linked to 3 year Bachelor degree	
AQF Diploma linked to 4 year Bachelor degree	
AQF Advanced Diploma linked to 3 year Bachelor degree	
AQF Advanced Diploma linked to 4 year Bachelor degree	
Vocational Graduate Certificate linked to....	
Vocational Graduate Diploma linked to ....	
3 year Bachelor degree linked to an Advanced Diploma	
3 year Bachelor degree linked to a Diploma	
4 year Bachelor degree linked to an Advanced Diploma	
4 year Bachelor degree linked to a Diploma	

It should be noted that minimum credit values need to be applied by education and training providers internally where they provide qualifications across the spectrum of the AQF as well as between providers.

The following other observations regarding the proposed operational guidelines need to be considered:

- The operational guidelines need to align with reporting requirements (AVETMISS) and performance monitoring to meet State Training Authority requirements (e.g. RPL outcomes). (Section 6.1.1 (iii)).
- The operational guidelines appear to impose a higher level of statistical collection than is currently required. (Sections 6.1.1(v) & 6.3.1(v)). VTA does not support initiatives that add administrative and regulatory burden.
- Table 1: describes minimum credit values not maximum. This needs to be more explicit.
- Table 1: Certificate IV qualifications are a critical entry level to particular occupations and relevant to credit pathways to further learning. Minimum credit values based on Certificate IV qualifications should be included.
- 6.2.7 (ii) can be strengthened by specifying it is the responsibility of the new education or training institution to provide transitional support for learners.
- 6.3.3 is comprehensive and covers the generally agreed characteristics of a robust, fair and accessible process for assessing RPL but 6.3.3.(iv) may be interpreted too literally in terms of actual minutes/hours spent and 'effort' is somewhat intangible. The clause may be improved by stating that 'RPL assessment should meet comparable *quality standards* to other assessment for the relevant qualification components.'

Within section 7, item 7 relating to the explanation of *credit* refers to the volume of learning. This term is not useful in determining equivalence of learning. While hours

are assigned to competencies at state level, they are related to funding the contact between learning and teacher and do not reflect the workload that a learner requires to successfully demonstrate competence. A careful definition perhaps related to the concept of designed learning time (e.g. Victorian Qualifications Navigator (formally Credit Matrix) should be developed to remove the potential confusion.

**Recommendation 12:** AQF Council explores credit value for Certificate IV AQF qualifications.

**Recommendation 13:** Review the scope of Table 1 (page 13) to include the depth of credit arrangements between schools, VET and HE.

**Recommendation 14:** Rename Table 1 (revised) as Minimum credit values based on relativities.

**Recommendation 15:** Clause 6.3.3. (iv) to read 'RPL assessment should meet comparable *quality standards* to other assessment for the relevant qualification components.'

**Recommendation 16:** 6.2.7 (ii) be amended to read 'Learners moving to a new education or training institution with credit, particularly from a Vocational Education and Training to a Higher Education environment, should be offered transition support *by the new institution.....*'

## CONCLUSION

VTA reaffirms support for the increased use of credit arrangements in Australia's education and training systems. Effective and efficient credit arrangements will provide benefits for learners, employers, teachers, trainers and key administrative personnel as well as enhancing learning pathways. Processes must be in plain English, transparent and, most importantly, consistently applied. Consistency requires a clear regulatory framework that will ensure universal adoption of the policy. Implementation must co-incide with mass marketing of the final policy, principles and operational guidelines and professional development at all levels.

The proposed reforms to credit arrangements must be considered in the context of the outcomes of other current initiatives: COAG's Human Capital Reform Agenda, the Bradley Review into Higher Education, AQTF 2007 and the recent consultations around the VET Products for the 21<sup>st</sup> Century have all raised questions about improved articulation between the education and training sectors. VTA hopes the AQF Council has the benefit of reviewing feedback to these consultations to inform this consultation process.

VTA looks forward to further consultations on the development and implementation of common terminology for credit and articulation.

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