



INDEPENDENT
HIGHER EDUCATION
AUSTRALIA

IHEA SUBMISSION

**FEEDBACK ON THE PROPOSED
AUSTRALIAN QUALIFICATIONS
FRAMEWORK QUALIFICATIONS
PATHWAYS POLICY: CREDIT AND
RECOGNITION AND CREDIT
RECOGNITION GUIDANCE**

15 July 2025

IHEA Submission

Feedback on the Proposed Australian Qualifications Framework Qualifications Pathways Policy: Credit and Recognition and Credit Recognition Guidance

Independent Higher Education Australia (IHEA) welcomes the opportunity to provide feedback on the revised Australian Qualifications Framework (AQF) Qualifications Pathways Policy: Credit and Recognition and Credit Recognition Guidance.

Introduction

Background

Updating the Pathways Policy and implementing the supporting Guidance is part of the broader Tertiary Harmonisation 2024–25 Budget measure.

The stated aim of this measure is to improve tertiary harmonisation, including by supporting better student pathways between vocational education and training (VET) and higher education, improving regulatory approaches for dual sector providers (including TAFEs) and enhancing tertiary data to provide better insights into how students interact with and move through the tertiary education system.

There were three recommendations regarding the Pathways Policy that came from the 2019 AQF Review:

- Recommendation 9: Develop guidelines in the AQF Qualifications Pathways Policy to facilitate the recognition of shorter form credentials, including microcredentials, for credit.
- Recommendation 11: Revise and rename the AQF Qualifications Pathways Policy to better recognise and encourage broader credit recognition, both within and between sectors.
- Recommendation 13: Provide more detailed guidance on recognition of prior learning in the AQF Pathways Policy.

The Government also undertook further technical work on what were identified as the more complex recommendations, including the three outlined above:

- The Department of Education (DoE) engaged PricewaterhouseCoopers (PwC) to undertake scoping and technical work for a number of recommendations. Following consultation with stakeholders, PwC developed an updated draft of the Pathways Policy and associated Credit Recognition Guidance, alongside other recommendations.
- In 2021, Nous Group was commissioned by DoE to undertake consultation to develop guidance for measuring credit for microcredentials for inclusion in the Pathways Policy.

Current request for feedback

DoE has subsequently contacted Dr James Hart, IHEA's Chief of Policy, to share drafts of a revised Pathways Policy and supporting Credit Recognition Guidance for review. Feedback was specifically sought on "red-line" issues by COB 15 July 2025.

DoE has stated that changes to the Pathways Policy from the current version include:

- Specifying the requirements and responsibilities surrounding credit for providers.
- Further clarifying the principles of recognition of prior learning (RPL) to ensure fairness and consistency.
- Highlighting the multi-directional and non-hierarchical pathways available to students.
- The inclusion of guidance on granting credit for microcredentials into AQF qualifications.

DoE has advised that the Credit Recognition Guidance document has been developed through a technical process to support implementation of the Pathways Policy, including more detailed information than the Pathways Policy with the aim to optimise credit transfer and RPL, such as:

- Advice on how to support student understanding of and access to credit.
- Best practice examples of recognition of prior learning.
- Further guidance on supporting multidirectional pathways, designing qualifications to support credit, negotiating systematic credit, and maintaining qualification integrity.

IHEA Feedback

IHEA welcomes the updates to the AQF Qualifications Pathways Policy and the Credit Recognition Guidance as positive steps toward improving the transparency, consistency and fairness of credit and RPL processes across the tertiary education system.

The recognition of formal, informal and non-formal learning is increasingly important in a system that serves diverse learners at different life stages and the definitions and principles provided are generally clear and beneficial across both VET and higher education.

That said, there are some important areas where the documents could be clarified or improved to ensure they support practical and fair implementation, in particular, for independent and non-self-accrediting providers.

Clarification in the pathways policy

In the AQF Pathways Policy, clauses 2.2.3 and 2.2.4 refer to the need for issuing organisations to develop and document articulation arrangements and qualification pathways. While this is sensible, in principle, the application of these clauses is unclear for non-self-accrediting providers, such as many independent higher education providers, who do not design their own qualifications and have limited ability to influence articulation arrangements.

Further clarification is needed about how these clauses apply in contexts where the qualification structure is determined externally, such as through TEQSA-accredited higher education courses or nationally endorsed training packages.

In a similar vein, clause 2.1.9 expands the list of suggested proportional credit arrangements via the inclusion of Undergraduate Certificates and the integration of VET qualifications, however, this is a pivotal opportunity to extend this guidance to the full suite of postgraduate qualifications. Importantly, this must also specify the proportion of credit that may be granted in a Master's Degree based on a student's prior completion of a Bachelor's Degree, as benchmarking conducted by an IHEA member in May 2025 across 21 institutions revealed significant inconsistencies among the 62% of institutions that publicly promote these specific credit opportunities.

Alignment of pathways with the purpose of the qualification

The guidance at times appears to assume that all qualifications should articulate "upwards" within the AQF, particularly from VET to higher education. While it is appropriate to encourage pathways, it's important to acknowledge that:

- Not all qualifications are designed to be part of a longer learning pathway.
- Many AQF Level 1–3 qualifications serve very specific job-entry purposes, often with no natural or necessary link to higher education.
- For example, a Certificate II in Meat Processing (Abattoirs) is clearly focused on workforce entry and not intended to articulate into a higher education qualification.

The guidance would benefit from explicitly recognising that not all qualifications need to lead into higher qualifications, and that pathway development should be encouraged where appropriate, not assumed as a standard feature.

Responsibility of providers

Sections 3.1–3.3 of the Credit Recognition Guidance place significant responsibility on providers to:

- Publish credit information before enrolment.
- Implement credit calculators and precedent databases.
- Provide timely, consistent and transparent decisions.

While this level of transparency is admirable in theory, in practice the reality is that many providers — especially smaller or independent institutions — are not in a position to easily implement these expectations. This is particularly the case for:

- Higher education providers that are not self-accrediting and rely on TEQSA for course approval.
- RTOs delivering nationally endorsed training packages, designed externally by Jobs and Skills Councils.

In these cases, providers do not control the course design and may not be able to offer predictable or standardised credit outcomes. As such, the guidance should differentiate between provider types and clarify that the capacity to publish detailed credit information varies depending on whether a provider develops its own qualifications or delivers externally accredited ones.

A further consideration for section 3.3 relates to the reference that issuing organisations should “ensure rigorous internal reporting of credit decisions”. Greater specificity regarding DoE’s definition of “rigorous” would be particularly instructive in mitigating the risk of misinterpretation. It would be helpful to clarify, for example, the expected level of detail in such reports — whether high-level, trend-based analyses are sufficient, or whether a more granular breakdown of the underlying data is required. Additionally, it would be useful to know whether DoE expects these reports to be routinely submitted to each provider’s Academic Board or whether an alternative internal governance body will suffice.

Responsibility for student pathway information

While the guidance focuses heavily on providers informing students about credit pathways, there is a strong case for this role to be shared — or even led — by the Government. Centralised platforms like Course Seeker, MySkills, and StudyAssist are already used by prospective students and are well-placed to provide standardised, up-to-date information about pathways and credit opportunities.

Placing the burden solely on individual providers risks inconsistency, duplication of effort, and confusion for students. A shared approach, led by government, would improve the reliability and accessibility of information for students, especially cross-sectoral pathways.

Risk of misaligned articulation

It is important to exercise caution about incentivising credit or articulation arrangements, which may encourage providers to create superficial articulation linkages, purely to satisfy regulatory expectations or funding eligibility. As with the VET FEE-HELP scheme, articulation agreements were initially required for course approval, which arguably led to arrangements that did not reflect genuine academic progression. As such, the guidance should stress the importance of academic integrity and alignment of students’ learning outcomes and avoid incentivising credit for its own sake.

The guidance should emphasise that credit and articulation must be based on genuine alignment of learning outcomes, and not simply on the existence of a formal agreement. Academic integrity needs to be the key consideration.

Qualification integrity

The section on qualification integrity (Clause 5.4) makes an important point about maintaining standards. However, the responsibility for ensuring the integrity of qualifications primarily lies with regulatory and accrediting bodies — TEQSA, ASQA, and Jobs and Skills Councils — not with individual providers alone.

Non-self-accrediting providers, in particular, should not be expected to carry the full responsibility for designing or managing system-wide pathways. Their role should be to ensure that their RPL and credit processes are sound and compliant, not to act as designers of the overarching policy framework.

Smaller and independent providers

The guidance, while non-binding, sets out detailed procedural expectations that could become de facto requirements, including:

- Maintaining internal and public precedent databases.
- Providing credit calculators, which can be exceedingly costly to establish and maintain.
- Timely decisions and documentation.
- Comprehensive staff training in credit assessment.

These expectations create resource and compliance burdens that may disproportionately impact smaller providers, particularly in the independent and private sectors, where there is less capacity. As such, the guidance should emphasise that implementation should be proportionate to the provider's scale, scope, and structure.

International recognition of prior learning

While the guidance rightly encourages rigorous processes for recognising international qualifications, smaller providers are often not equipped to assess overseas credentials without external support or established equivalency frameworks.

A better approach would be for government agencies, such as the DoE, DEWR, TEQSA, or ASQA, to develop centralised tools, training or services that support consistent and fair international RPL assessments.

Who We Are

Independent Higher Education Australia Ltd. (IHEA) is a peak body established in 2001 to represent Australian independent (private sector) higher education institutions. Our membership spans independent universities, university colleges and other institutes of higher education, all of which are registered higher education providers accredited by the national higher education regulator, TEQSA or associate members seeking registration.

Our Vision is that: students, domestic and international, have open and equitable access to world class independent higher education in Australia, built on the foundations of equity, choice, and diversity.

Our Mission is to represent independent higher education and promote recognition and respect of independent providers as they contribute to Australian education, the Australian economy, and to society in general. We achieve this by promoting continuous improvement of academic and quality standards within member institutions, by advocating equity for their staff and students, and by delivering services that further strengthen independent providers' reputations as innovative, sustainable, and responsive to the needs of industry and other relevant stakeholders in both higher education and vocational education and training. IHEA's commitment is to excellence, productivity and growth in independent higher education being delivered through a trusted Australian education system underpinned by equity, choice, and diversity.

IHEA members have different missions, scales, and course offerings across the full AQF range (Diplomas to Doctorates). IHEA has 87 members, which comprise:

- Five private Universities (Australian University of Theology, Avondale University, Bond University, Torrens University and University of Divinity).
- Six University Colleges (ACAP University College, Australian University College of Divinity, Alphacrucis University College, Excelsia University College, Moore Theological College and SAE University College).
- A further eight (Griffith College, International College of Management Sydney, Kaplan Business School, Marcus Oldham College, Morling College, Photography Studies College, The College of Law and Western Sydney University International College) self-accrediting institutes of higher education (nineteen in total including the Universities and University Colleges described above).
- Seventy one not-for-profit and for-profit institutions of higher education (which includes three self-accrediting institutes); and related corporate entities.

IHEA members teach approximately 74 percent of the students in the independent sector (i.e., more than 130,000 students) and educate students in a range of disciplines, including law, agricultural science, architecture, business, accounting, tourism and hospitality, education, health sciences, theology, creative arts, information technology, human services and social sciences.

IHEA holds a unique position in higher education as a representative peak body of higher education providers. Membership in IHEA is only open to providers registered, or seeking registration, with the Australian regulator – TEQSA. However, some IHEA members are dual and multi-sector providers who also deliver VET and/or English Language Intensive Courses for Overseas Students (ELICOS) courses.

Contacts:

The Hon. Dr. Peter Hendy
Chief Executive Officer
Email: Peter.Hendy@ihea.edu.au
Phone: 0418 679 911

Dr James Hart
Chief of Policy
Email: James.Hart@ihea.edu.au
Phone: 0418 694 680