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AUSTRALIA INDIA EDUCATION COUNCIL

Quality Assurance and Qualification Recognition Exchange Project

An Issues Paper: Aligning qualification recognition between India and Australia

Professor Jane den Hollander and Professor H. A. Ranganath

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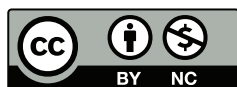
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1. BACKGROUND AND CONTEXT

On 8 April 2010, the Education Ministers of Australia and India signed a joint statement affirming their commitment to continue to expand collaboration in education, training and research between Australia and India. This included an agreement to work with relevant bodies to develop methods for facilitating agreed recognition of qualifications and credit transfer arrangements between Australia and India, student and staff mobility and skills development.

The Australia India Education Council (AIEC) was established in 2011 in order to prioritise the strategic direction of the bilateral education partnership between India and Australia and to provide a forum for academia, industry and government to develop strategic advice to focus and shape collaborative efforts. The AIEC is now progressing projects in key priority areas of mutual benefit including quality assurance and qualifications recognition, skills agenda, institutional collaboration in higher education, student mobility and welfare, and joint research.

The AIEC affirmed the need to establish the Australia India Quality Assurance and Qualification Recognition Exchange (QAQRE) project in order to expedite and enhance quality assurance and qualification recognition between India and Australia.

This project has progressed significantly and the rest of this paper reports on the work to date.

2. QUALITY ASSURANCE AND QUALIFICATION RECOGNITION EXCHANGE (QAQRE) PROJECT

The project leads are:

- › Professor Jane den Hollander, Vice-Chancellor Deakin University, Australia
- › Professor H.A. Ranganath, Director, National Assessment and Accreditation Council (NAAC), India

During 2011 information related to the implementation of the legislation of the new Tertiary Education Quality and Standards Agency (TEQSA) was shared with Indian colleagues through the various formal and informal channels. As well, the Australian Qualifications Framework update was distributed as a resource to the Association of Indian Universities (AIU) and others wishing to engage with the Australian tertiary education system. Professor Jane den Hollander met with Dr Beena Shah, the (then) President of the AIU in Delhi, to discuss aspects of the proposed project.

The current phase of the project, which has initiated the development of this report, involved a targeted study tour (24-28 September 2012) by qualifications experts from India to identify key considerations for qualification recognition/equivalence¹ between the two countries. The study tour participants were:

- › Professor H.A. Ranganath, Director, National Assessment and Accreditation Council (NAAC)
- › Dr R. Krishnakumar, Secretary General (Additional Charge), Association of Indian Universities and Vice-Chancellor, Yashwantrao Chavan Maharashtra Open University, Nasik
- › Mr S.Srivastava, Section Officer (International Cooperation), Association of Indian Universities (AIU)
- › Dr K. Gunasekaran, Additional Secretary, University Grants Commission (UGC), New Delhi

¹ Note: India uses the term 'equivalence' when referring to qualifications 'recognition'.

The participants were hosted by the Department of Industry, Innovation, Science, Research and Tertiary Education and Universities Australia in Canberra; by Deakin University in Melbourne; and by the University of Ballarat in Ballarat.

Appreciation is extended to Ms Ravneet Pawha from the Deakin India Office who helped facilitate the study tour visit in Australia and Ms Heather Sainsbury who assisted with drafting the Issues Paper.

The study tour included a focus on the quality assurance of:

- › recognition of prior learning (RPL)
- › credit recognition
- › accelerated or fast-track degree programs
- › distance education and multi-campus/affiliated partner provision (including pathway programs and twinning arrangements)
- › foundation programs

The study tour program included:

- › Meetings with
 - Department of Industry, Innovation, Science, Research and Tertiary Education, AEI-NOOSR and Mobility, Universities Australia
 - TEQSA
- › Technical site visits to
 - Deakin University
 - University of Ballarat

3. INDIA'S QUALITY ASSURANCE AND QUALIFICATIONS RECOGNITION ARRANGEMENTS

India has 12 years of schooling which is followed by three to four years of a Bachelor degree, and a further two years to obtain a Master degree. India has 19 professional bodies to regulate professional higher education in India.

The education system in India is regulated by the Ministry of Human Resource Development (MHRD), Government of India. The UGC is one of the regulating bodies under MHRD. All the Higher Education Institutions (HEIs) in India are regulated by the UGC which also provides financial assistance to Central, State, and a few Deemed Universities and Colleges which meet the required specifications under the UGC Act (1956). All Universities (634) and Colleges (33,000) are governed by the UGC Regulations.

NAAC, an autonomous organ of UGC, has the responsibility of accrediting higher educational institutions in India. It is voluntary for the HEIs to opt for accreditation. The National Board of Accreditation (NBA), an organ of the All India Council for Technical Education (AICTE), does program accreditation for engineering and other programmes.

AIU has been according equivalence to foreign degrees obtained by Indian students since its inception. Equivalence accorded by AIU is accepted by Indian universities for the purpose of admission to higher courses as well as employment. AIU accords equivalence to the degrees provided that (i) the duration of the course (ii) the eligibility requirements and (iii) the course curriculum remains the same as that of Indian universities.

The Eligibility Rules with regard to professional courses are framed by the respective Councils which are the regulatory bodies. This Committee recommends the Government of India consider framing any future higher education qualifications framework so that all universities have a common platform to structure their syllabi. In order to maintain quality assurance, it is recommended that accreditation is made compulsory. However, a mechanism needs to be developed which will ensure speedy accreditation of all institutions.

Once a common qualifications framework is formulated, universities will need to consider and agree on criteria to ensure compliance to minimum standards as well as provisions for diversity. This will assist the AIU and appropriate agencies to accord equivalence. Compulsory accreditation will also enable universities to follow common standards.

Rules with regard to duration of the degree programme/course are framed by the UGC on behalf of the Government of India and sent to the MHRD for its approval. Any change in the existing rules requires desired permissions from the MHRD.

4. AUSTRALIA'S QUALITY ASSURANCE AND QUALIFICATIONS RECOGNITION ARRANGEMENTS

Regulation of higher education in Australia

From January 2012 TEQSA has regulated higher education in Australia in accordance with the *Tertiary Education Quality and Standards Agency Act 2011*. Entities must be registered by TEQSA before they can offer or confer Australian higher education awards. TEQSA may grant or renew registration for a period not exceeding 7 years if it is satisfied that the entity meets the Higher Education Threshold Standards (see below).

All providers of higher education that gain registration by TEQSA through meeting the threshold standards become 'Higher Education Providers'; this title signifies that the provider is a bona fide provider of quality higher education in Australia. Providers may also be registered in other categories that use the word 'university', as listed in the Provider Category Standards (see below). These categories are:

- › Australian University
- › Australian University College
- › Australian University of Specialisation
- › Overseas University
- › Overseas University of Specialisation.

Registered higher education providers must have their courses accredited before those courses can be provided. Some providers (including those registered in the Australian University provider category) are authorised to self-accredit their own courses. The self-accrediting authority of different provider categories is as follows:

Provider category	Self-accrediting authority
Australian University	Authorised to self-accredit each course that leads to a higher education award that it offers or confers.
Australian University College	TEQSA will authorise the higher education provider to self-accredit all courses.
Australian University of Specialisation	TEQSA may authorise the higher education provider to self-accredit all courses in its one or two broad fields of study only.
Higher Education Provider Overseas University Overseas University of Specialisation	TEQSA may authorise the higher education provider to self-accredit a course or courses at one or more award levels and in one or more broad fields of study or discipline areas if criteria specified in the Provider Course Accreditation Standards (see below) are met.

TEQSA may accredit a course offered by a registered higher education provider which is not authorised, to self-accredit the course for a period not exceeding 7 years.

As well as regulating higher education, TEQSA is responsible for regulating:

- › all Foundation Programs (except those delivered by schools), regardless of whether they are delivered by registered VET, higher education or dual-sector providers
- › English Language Intensive Courses for Overseas Students (ELICOS) delivered by higher education providers or by ELICOS providers in partnership with a higher education provider.

Standards-based quality framework for higher education

TEQSA registers and evaluates the performance of higher education providers using a standards-based quality framework. The framework is a series of standards made by the Minister on the advice of the Higher Education Standards Panel established by the TEQSA Act.

To be registered and maintain registration, providers must comply with Higher Education Threshold Standards which comprise:

- › *Provider Registration Standards* – covering: provider standing; financial viability and safeguards; corporate and academic governance; primacy of academic quality and integrity; management and human resources; responsibilities to students; and physical and electronic resources and infrastructure.
- › *Provider Category Standards* – additional standards for providers in different categories.
- › *Provider Course Accreditation Standards* – to be met by TEQSA-accredited and provider-accredited courses, covering: course design; resourcing and information; admission criteria; teaching and learning quality; assessment; and course monitoring and review.
- › *Qualification Standards* – setting out requirements for higher education awards (including compliance with specifications described in the Australian Qualifications Framework discussed below), certification documentation, and articulation, recognition of prior learning and credit arrangements.

Regulation of vocational education and training sector

The Australian Skills Quality Authority (ASQA) regulates Australia's vocational education and training (VET) sector in accordance with the *National Vocational Education and Training Regulator Act 2011*. ASQA's functions include the registration of training providers as 'registered training organisations' (RTOs) and the accreditation of courses. ASQA's jurisdiction extends to States who have referred their powers to the Commonwealth (all except Victoria and Western Australia) and to the Territories. RTOs in Victoria and/or Western Australia may be subject to regulation by either their State regulator, ASQA or both.

As a condition of registration by ASQA, RTOs must comply with the requirements set out in the VET Quality Framework which comprises:

- Standards for National VET Regulator (NVR) Registered Training Organisations
- Fit and Proper Person Requirements
- Financial Viability Risk Assessment Requirements
- Data Provision Requirements
- Australian Qualifications Framework (see below)

Standards for VET Accredited Courses apply to all courses regulated by ASQA.

ASQA and TEQSA cooperate in the regulation of dual-sector providers.

Legislation and standards for delivery to international students

Legislation and standards for courses and delivery to international students in Australia are established in the:

- Education Services for Overseas Students Act 2001 (ESOS Act) and
- National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007.

The Act and Code are designed to protect the interests of students coming to Australia on student visas.

Providers must be included on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) before they can provide courses to overseas students who have Australian student visas. Courses which a provider wishes to deliver to overseas students must also be on the register.

TEQSA and ASQA are responsible for processing applications for registration or renewal on CRICOS relevant to their sector responsibilities.

Australian Qualifications Framework

The Australian Qualifications Framework (AQF) is the national policy for regulated qualifications in the school, vocational education and training and higher education sectors in Australia. Providers in all sectors must comply with its requirements. First introduced in 1995, the AQF was revised in 2011 to ensure that qualification outcomes are relevant and nationally consistent, continue to support flexible qualifications linkages and pathways and enable national and international portability and comparability of qualifications. All requirements of the revised AQF must be met from 1 January 2015.

The AQF provides the standards for Australian qualifications. It includes:

- learning outcomes for AQF levels and qualification types
- specifications for the application of the AQF
- requirements for issuing AQF qualifications
- requirements for qualification linkages and student pathways
- requirements for registers of organisations authorised to accredit and issue AQF qualifications and AQF qualifications and pathways.

The AQF provides a structure of levels and qualification types each of which is defined by a taxonomy of learning outcomes. The AQF levels define the relative complexity and depth of achievement and the autonomy required of graduates to demonstrate achievement. There are 10 levels, with level 1 having the lowest complexity and level 10 the highest complexity, as shown in the table below.

AQF Levels	Qualification Types
1	Certificate I
2	Certificate II
3	Certificate III
4	Certificate IV
5	Diploma
6	Advanced Diploma Associate Degree
7	Bachelor Degree
8	Bachelor Honours Degree Graduate Certificate Graduate Diploma
9	Master Degree
10	Doctoral Degree

The focus of the AQF is on setting and assessing student learning outcomes rather than on inputs such as time and mode of delivery. Thus it is a competency or capability based framework rather than a time served framework. It is the responsibility of the entity awarding the qualification to ensure the quality of the learning outcomes and that the graduate has satisfactorily completed any requirements for awarding the qualification. However, the AQF does include 'volume of learning' requirements which identify the 'notional duration of all activities required for the achievement of the learning outcomes specified for a particular AQF qualification type', expressed in 'equivalent full time years'. The 'typical' volume of learning for each qualification type is specified.

The AQF recognises 'generic learning outcomes', defined in Australia as the 'transferable, non-discipline specific skills' a graduate may achieve through learning that have application in study, work and life contexts'. These must be specifically identified in each qualification and sit alongside the content/discipline specific skills.

TEQSA interprets and applies the Threshold Standards and the AQF when assessing applications relating to higher education provider registration and course accreditation.

Many Australian higher education courses are also accredited by external professional bodies. This is in addition to TEQSA or self-accreditation of courses. By way of example, engineering degrees are accredited by Engineers Australia and, while this accreditation is not necessary for the degree award, those institutions who do not have professional accreditation suffer as the employment of their graduates is affected.

Qualification recognition

Each accredited Australian qualification must include documented pathways consistent with the *AQF Qualifications Pathways Policy*. The purpose of the policy is to maximise the credit that students can gain for learning already undertaken. Credit is recognised regardless of how, when and where it was acquired, provided that the learning is relevant and current and has a relationship to the learning outcomes of the qualification. Recognition is given to formal, non-formal and informal learning.

Decisions regarding credit are made by issuing organisations, including universities and other self-accrediting higher education institutions. Credit can be given on the basis of individual negotiations between students and issuing organisations or formal negotiated agreements between issuing organisations. Credit can be given to students in the form of block, specified or unspecified credit. Credit arrangements negotiated between issuing organisations for credit towards AQF qualifications at any level must take into account the comparability and equivalence of: learning outcomes; volume of learning; programs of study, including content; and learning and assessment approaches. Decisions by issuing organisations in relation to credit grants are required to be evidenced based, equitable and transparent.

AEI-NOOSR provides information and advice to Australian institutions about overseas education systems to facilitate the recognition of overseas qualifications in Australia. A high degree of reliance is placed on this advice to inform decisions by higher education providers about course equivalence. Another source of information and advice on qualifications worldwide is NARIC UK.

5. SIMILARITIES AND DIFFERENCES OF QUALITY ASSURANCE AND QUALIFICATIONS RECOGNITION ARRANGEMENTS

Assuring the quality of higher education is a priority for both Australia and India and quality controls have been in place in both countries for many years. However, each is operating in a different national context resulting in some key differences in quality assurance and qualifications recognition arrangements which were highlighted in the discussions that took place during the Indian study tour to Australia (24-28 September 2012). A table summarising the approaches of the two countries and some resulting challenges to mutual recognition is included in the Appendix.

In summary, Australia has a well-established regulatory environment and national qualifications system which focuses on graduate outcomes. While the Threshold Standards set minimum requirements for inputs by providers (including the provision of student support, infrastructure and resources, quality of teaching and course design), flexibility is allowed in terms of mode of delivery and course duration. The AQF includes a clear policy to maximise credit for prior learning.

By contrast, the size, complexity and diversity of the Indian higher education system has resulted in a different approach to quality assurance. A national higher education qualifications framework is currently being developed. AIU will reconsider the procedure of qualifications recognition in the context of the new qualifications framework.

6. RECOMMENDATIONS FOR FUTURE WORK, INCLUDING POTENTIAL PROJECTS

First of all India too should have its own Indian Qualifications Framework to guide and inform Indian Universities so that credit and learning outcomes are comparable and measurable, thus enabling the mobility of the students within Indian Universities and also facilitating improved mobility for foreign students.

It is further recommended that the AIEC QAQRE Working Group nominate up to four representatives from each country (with appropriate support) to:

1. Develop a matrix to assess the alignment of and differences between the Australian and (proposed) Indian national qualification frameworks and possible synergies between the two.
2. Develop strategies to facilitate agreed recognition of qualifications and credit transfer between India and Australia
 - a. Examine credit transfer in the fields of Engineering and Management as most of the universities and institutions have introduced Credit Systems and international standards agreed by professional bodies are widely accepted.
 - b. Examine the Australian Graduation Statement as an acceptable record of provenance of all credit (for example from pathway institutions) contributing to an Award for qualifications recognition/equivalence purposes of relevant Indian authorities.
3. Consider the success of the Recommendations 1 and 2, and there from:
 - a. develop a joint NOOSR-type database shared between Australia and India for their mutual benefit and ease of recognition of qualifications
 - b. establish arrangements for the recognition of qualifications by trusted institutions.
4. Resolve to meet regularly to discuss and problem solve issues related to recognition of qualifications and credit transfer between India and Australia.

To facilitate these recommendations, an Action Plan including a time line, responsibilities and funding will need to be determined by the QAQRE Working Group.

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Professor H.A. Ranganath
Director
National Assessment and Accreditation Council

APPENDIX

Comparison of quality assurance and qualifications recognition arrangements in Australia and India

Feature	Australian approach	Indian approach	Resulting challenges to recognition
National framework	Australia has an agreed national qualifications framework (the AQF).	India is in the process of finalising its national framework and expects the same will be established soon.	The differences between the two systems make it difficult to evaluate course equivalence. Recommendation 1 will resolve this difficulty.
Course accreditation	Australian universities (and other higher education providers authorised by TEQSA) accredit their own courses in accordance with the Threshold Standards and AQF specifications. Many higher education courses are also accredited by external professional bodies, for example Engineers Australia.	Indian Universities enacted either through Central Act/State Act/Deemed Universities/Institutes of National Importance are eligible to award degrees. Institutions which are not included in the above categories are not eligible to award degrees. The professional degrees are controlled, monitored and approved by their respective Councils.	In India, in the absence of the compulsory accreditation policy, it is optional for universities to seek accreditation. However, it is expected that soon a Law will be enacted through Parliament and it will be compulsory for universities to have accreditation.
Focus on inputs or outcomes	The AQF focuses on setting and assessing student learning outcomes at the appropriate level rather than on inputs such as the manner and mode of delivery.	In India greater emphases are put on the curriculum, duration of course and the method of delivery. Emphasis is put on the theoretical part of the curriculum and the learning methods are examined through written test. In India no professional courses can be pursued through distance mode in which there is no face to face relationship, as more emphasis is put on the practical aspects and learning methods than on the competency outcomes.	The qualifications of students studying in Australia in distance or online mode are recurrently not recognised in India. No education award acquired through distance mode/online, from any accredited university, has been accorded equivalence.

Feature	Australian approach	Indian approach	Resulting challenges to recognition
Course duration	The AQF has 'volume of learning' requirements based on 'equivalent full time years'. This allows Australian institutions to offer flexibility in terms of the duration of their courses; students may choose to accelerate or spread out their studies according to their individual needs and preferences.	In India, universities follow either a yearly system or in some courses a semester or trimester system has been introduced. Universities are strictly required to adhere to it. No student is allowed to complete the course early.	In the absence of policy it is difficult in India to accept degrees which are lesser in duration or degrees pursued through a fast track system.
Transferable skills	The AQF recognises 'generic learning outcomes' which can be transferred from one discipline to another and applied in the workforce.	Unless and until a national qualifications framework is worked out and accepted, it is difficult to allow students to transfer from one discipline to another.	A new national higher education qualifications framework is expected to facilitate better student transfer arrangements.
Pathways/ credit for prior learning	The AQF encourages providers to maximise credit that student can gain for learning already undertaken, regardless of how, when and where it was acquired.	India does not have any such system. India has a more traditional systematic education policy.	

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