

## Policy Analysis

### The Australia Qualifications Framework

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#### *Executive summary*

The major objective of the Australian Qualifications Framework is to provide a coherent national framework to embrace the diverse range of vocational and academic qualifications across the three sectors concerned with post-compulsory education: schools, vocational and training, and higher education. The Framework was established in 1995 and is meant to serve a number of purposes: facilitating flexible pathways in education and training between the sectors; encouraging cross-sectoral collaboration; and, promoting recognition of the Australian higher education courses in the globalised market. The Framework has only a broad and indirect impact on the setting and maintenance of academic standards in higher education. Its impact on standards comes from its inclusion as an element of the Australian Higher Education Quality Assurance Framework developed in 2000 aimed primarily at protecting Australia's international reputation for quality in higher education. The Qualifications Framework provides a reference point for the National Protocols for Higher Education Approval Processes, and for the auditing of the standards of awards by the Australian Universities Quality Agency.

## Introduction

Australia is a federation of state and territory governments. The relationship of the Commonwealth and States with respect to the Australian higher education system is historically complex and has ambiguities that make a national policy on qualifications and standards problematic. Responsibilities for the universities are shared between the Commonwealth and eight States and Territories. The States and Territories are responsible for legislation establishing universities and for accreditation approval processes. The Commonwealth provides most of the funds for the universities and is able to steer the policies of the universities by way of financial incentives and penalties related to a range of compliance measures.

All but three of the 39 universities in Australia are public, but the level of Commonwealth funding has declined to a point where it is only a small proportion of the funds in the major institutions. The public universities in Australia have more autonomy than their counterparts in most other countries. Importantly, Australian universities are ‘self-accrediting’ institutions. Neither the State nor Commonwealth governments directly control or manage what is taught, or how it is taught, or by whom. Universities set their own entry standards as well as the academic standards of their courses. As long as the universities have in place internal mechanisms to assess new course proposals and accredit courses, they are generally free to design and deliver programs, and set standards of student achievement, without the scrutiny of external bodies.

Despite the Commonwealth’s interest in quality assurance it has not pursued any direct measures or processes to set or monitor the academic standards of courses. It has invested considerable resources in a national Graduate Skills Assessment test of generic attributes to demonstrate the value added by undergraduate degrees, but this is yet to have any impact on the behaviour of universities.

Traditionally, there have been few objective reference points for the standards of Australian awards and there are no significant external moderation processes.

From time to time there have been national discipline reviews and public enquiries to examine academic standards. The discipline reviews typically focused on the performance of students in the honours programs (the four year undergraduate degree) that had a common currency nationally as a preparation for entry into research higher degrees.

From a series of Australian case studies of universities, Anderson (2001:1) observed that none of the Vice-Chancellor’s and Deans interviewed on the subject of quality assurance ‘had any reliable or valid means of knowing how good their degrees were– for example how intellectual standards might change over time, vary between fields or compare with other institutions.’ Indeed, there appear to be few objective means for checking standards. Anderson found the methods typically used by universities to check on the academic standards of their degrees included:

- Self-reporting of the standards of knowledge and the intellectual characteristics which distinguish between important levels of achievement;
- Graduate destinations, particularly admission to selective higher degree programs;

- Systems of examining that includes external examiners;
- Academic Standards Panels working from a “Code of Practice for monitoring academic quality and standards” as operated by the Australian Vice-Chancellor’s Committee (AVCC) a decade ago;
- University-initiated rolling reviews of departments (or programs) that include scrutiny of the assessed work of students;
- Scrutiny by professional organizations operating on the assumption that a minimum standard for entry into the relevant profession is identified.

The influence of the various professional bodies that accredit professional course such as engineering, accounting and medicine, has increased considerably in recent years. These groups play a role in the quality assurance process, and in the development and maintenance of the national qualifications framework. Also, the assessment of research degrees by thesis is done externally and often includes overseas examiners.

## The Policy Problem

The Australian Qualifications Framework (AQF) was introduced in 1995, and phased in over five years. It was initiated primarily to bring a diverse array of qualifications and titles together as one nationally recognised scheme. The main focus then was on supporting reforms in the vocational and training sectors across the States. In the vocational and training sectors what employers and institutions needed to know —from an increasingly complex array of award- bearing courses across the states — was what students had learned. This was most obviously critical in terms of credit transfer within the sector, but as universities made their existing course more accessible and created more vocationally oriented courses, the credibility of their programs was at risk at the entry point where judgements are made about the relative standing of prior qualifications.

Since then, the policy context has changed dramatically. To maintain its international competitiveness, the Commonwealth is concerned that Australia’s qualifications must be recognised internationally if it is to continue to attract international students. Of growing importance is the recognition factor for domestic students, many of whom expect to work or study overseas. Credit transfer arrangements are motivated by the need to build a national skill base, to enable the system to respond to rapid changes in workplace requirements for skilled workers, and to promote lifelong learning. From the Commonwealth perspective Australia has been relatively weak on the clarity of its credit transfer between institutions, and therefore exposed to the emerging competition from universities developing the Bologna model.

Nothing is currently more important to the Australian higher education sector than the international recognition of the quality of its qualifications. Australian universities are so heavily dependent on their capacity to attract international fee-paying students that they can ill-afford to allow any uncertainty or ambiguity about course structures, pathways and standards. The

Commonwealth and State governments are highly sensitive to the economic and social significance of international students. The assessment of quality by overseas students, institutions, and governments starts with their recognition of the nature, currency and transferability of qualifications offered by Australian institutions, and where they stand in the international market.

The Qualifications Framework provides a means of resolving or at least managing these policy problems and, minimising the three levels of tension, that is: State and Commonwealth priorities; the different missions of the higher education and vocational sectors; and the relationship between industry and institutional qualifications. By providing a systematically formulated framework for the assessment of the expected broad learning outcomes of higher education qualifications, the Framework fills a policy gap that gives the other quality assurance mechanisms some reference points for the accreditation of providers and courses, and for auditing the performance of institutions.

The move towards formal protocols for university accreditation was prompted by an application in 1999 by Greenwich private university, supported by the Norfolk Island government, for listing on the Framework register. It exposed the lack of a national approach to the accreditation of higher education. Since the Framework was not designed with quality assurance and academic standards as a central issue, its contribution to resolving the policy problem of academic standards relates to its inclusion as part of a national quality assurance framework introduced in 2000 following the Greenwich issue. The main policy concern in this respect was the potential threat to Australia's reputation for high academic standards in the face of new private for-profit providers, and a more general public concern about lower standards or 'soft-marking' for international students.

The sharper focus of the Framework on the higher education sector was also influenced by the rapid expansion of student numbers in the late 1990s, and the dramatic increase in Australia's share of the international student market. At that time, the forms of quality assurance for higher education at a national level in the were limited, and the sophistication of processes at the level of the institution varied considerably. As the imperative for a 'truly national system, recognised for its high quality' became more pressing, the Commonwealth and States agreed in 2000 to develop the Australian Higher Education Quality Assurance Framework (AHEQAF). At this point the Qualifications Framework took on new significance, with its broad descriptors of levels of knowledge, skills, and abilities characterised as learning outcomes specific to each level of academic qualification.

At another level of policy problem, the arrangements between the Commonwealth and the States are currently being debated in the higher education sector as the Commonwealth argues for a rationalising of responsibility. The Qualifications Framework is one example of an attempt to deal with this policy problem of:

*...complexities in the shared arrangements, a lack of consistency to the largely historically determined nature of them, and limitations and constraints that result from having nine jurisdictions involved. (DEST 2005:1)*

The Commonwealth pointed to the potential confusion created by inconsistencies in the implementation of the National Protocols by the States (DEST 2005), and the risks involved for consumers who need to be assured that providers of higher education in Australia have met certain criteria and standards.

## The main elements of the qualifications framework

The Qualifications Framework is broadly characterised as a national policy instrument to protect the quality of Australian education and training. It comprises a unified system of national qualifications for all education sectors to ensure that there is nationally consistent recognition of the outcomes of qualifications awarded by Australian schools, colleges and universities. The Framework links together 15 qualifications (Table 1) as a highly visible, quality-assured national system.

**Table 1. Qualifications by the educational sector in which they are most commonly used.**

<i>Vocational Education and Training Sector</i>	<i>Higher Education Sector</i>
Vocational Graduate Diploma	Doctoral Degree
Vocational Graduate Certificate	Masters Degree
	Graduate Diploma
	Graduate Certificate
	Bachelor Degree
	Associate Degree,
	Advanced Diploma
Advanced Diploma	
Diploma	
<i>Senior Secondary Certificates:</i>	
Certificate IV	
Certificate III	
Certificate II	
Certificate I	

The conceptual approach embedded in the operational objectives of the Framework is essentially one of providing a formal classification process that regulates by identifying and authorising the various agencies responsible for accrediting the qualifications, and maintaining a public register of those authorised. It defines the differences between the qualifications in terms of the levels, expectations and learning outcomes (broadly conceived).

The Framework has multiple purposes and is expected to meet the needs of a diverse range of stakeholders. It embraces, for example, the lifelong learning agenda of particular interest to the vocational and training sector; the promotion of access and equity policy; the provision of more and higher quality vocational training; and, the recognition of prior learning.

The key elements of the Framework are:

- A set of national guidelines and descriptors of all awards for each of the current qualifications issued in Australian schools, vocational education and training, and higher education sectors (Table 1);
- A set of principles for articulation and credit transfer;
- A register of authorities at the State levels empowered by the Australian Government to

accredit post-compulsory education and training to accredit qualifications and to issue qualifications; and,

- A series of protocols for issuing qualifications and a structure for monitoring implementation of the AQF and advising Ministers, including recommending any changes.

Table 1 perhaps gives the impression that these are tight boundaries. However, the qualifications are actually grouped according to the sector in which they are most commonly used. There are, for example, some Certificate I-IV qualifications issued in the higher education sector. However, there are no masters degrees issued in the vocational sector. Where the vocational and higher education sectors have qualification titles in common, the Framework guidelines suggest they are 'equivalent although sector-differentiated', that is, they have parity of esteem: 'there are no standardised rankings or equivalences between different qualifications issued in different sectors, as these qualifications recognise different types of learning reflecting the distinctive educational responsibilities of each sector.'

The Framework guidelines (AQF Implementation Handbook 2005) spell out the main criteria for defining the qualifications listed in Table 1. The characteristics of each qualification are expressed in terms of learning outcomes in the attempt to provide common ground for qualifications across the sectors. The table suggests a hierarchy of qualifications and a vertical pathway to the top. The pattern of progression for individual students is not necessarily along that line and there is blurring of boundaries between the sectors, which makes the setting, monitoring and consistency of standards more difficult to manage at the system level.

The guidelines for the Bachelor Degree, illustrate the detail of the Framework, and the extent of its influence. First, concerning who has the authority for the learning outcomes of the Degree, there is a generic statement to the effect that the universities have autonomy on these matters. Second, with respect to standards in the higher education sector, the guidelines refer to the responsibility for the assessment of individuals as resting ultimately with the provider institution or organisation and not those who actually conduct the testing of achievement.

The third element is the 'Characteristics of the Learning Outcomes' provided for each level of qualification. For the Bachelor Degree, they include, for example:

- the acquisition of a systematic and coherent body of knowledge;
- development of academic skills and attributes necessary to undertake; research, comprehend and evaluate new information;
- a foundation for self-directed and lifelong learning; and,
- interpersonal and teamwork skills appropriate to employment and/or further study.

Reference is also made to the 'significant depth and progressive development of the course content' in the Bachelor Degree as the basis for postgraduate study and professional careers.

### ***The National Register***

The National Register in the Qualifications Framework has five sub-categories:

1. Government Accreditation Authorities;
2. Universities and Other Self-Accrediting Higher Education Institutions;
3. Non Self-Accrediting Higher Education Institutions and their AQF-approved qualifications;
4. Registered Training Organisations and their AQF-approved qualifications (VET sector); and,
5. Overseas Higher Education Institutions and their AQF-comparable approved qualifications

To be listed on the National Register a university must have been recognised or established by a State or Territory Minister. Again, it needs to be noted that the Commonwealth does not have the authority to approve the establishment of providers. All Australian universities that have been recognised or established by a MCEETYA Minister are listed on the Register. Higher education courses delivered by approved non self-accrediting providers are also listed. Only government accreditation authorities listed on the AQF register are able to accredit courses. The effect of this is that by approving a course for listing, the State and Territory ministers are deemed to vouch for the quality of the higher education provider, the course, or the accreditation authority.

### ***Advisory Board***

The Qualifications Framework is operated by an Advisory Board. The priorities of the Board include establishing a mapping exercise to collate examples of courses accredited against the Framework, and to encourage and promote consistency on a national basis. The Advisory Board has an essentially custodial rather than operational role in the implementation of the Framework. It manages a fairly straightforward bureaucratic process of inventory keeping and procedural measures that provide national order and consensus to deal with the diversity of qualifications across sectors.

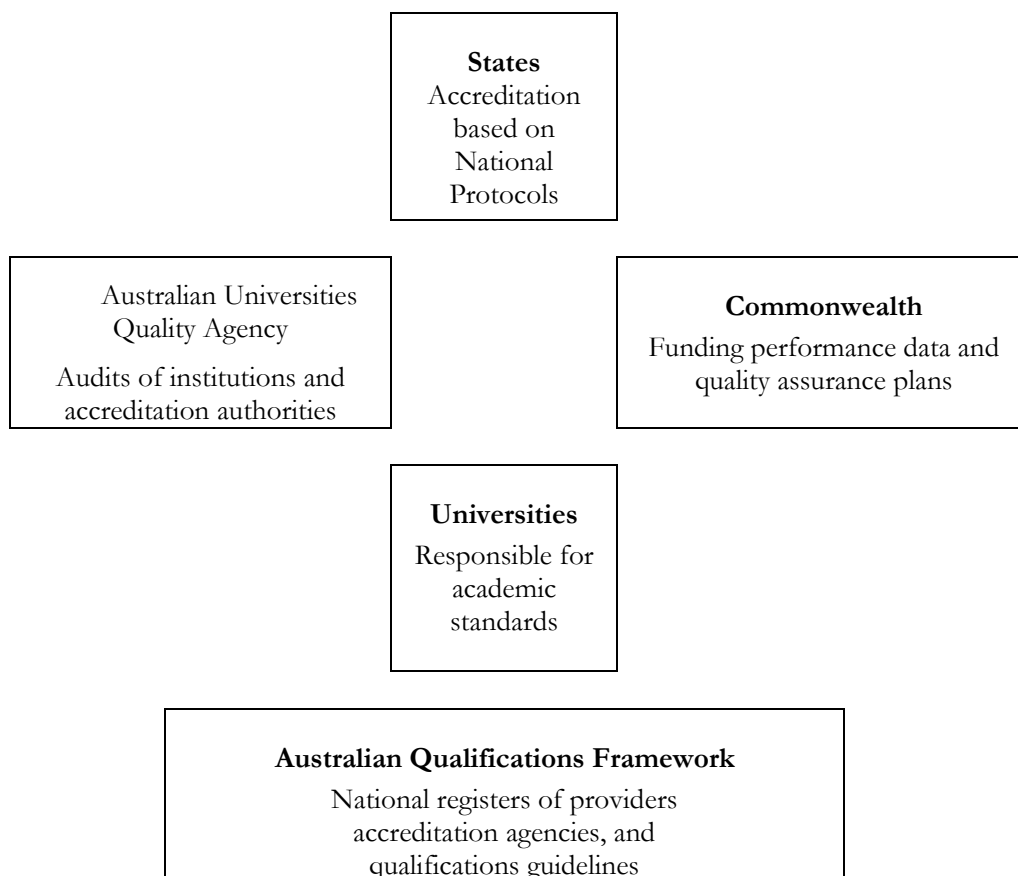
The Board is not empowered to take initiatives to shape the standards of the qualifications it registers, although the members, representing the diverse cross-sectoral interest groups, bring their expertise to bear by informing and shaping the national agenda. Similarly, the extensive quality assurance processes that underpin the Framework qualifications are the responsibility of each of the sectors.

## **Implementation of the Framework**

It was not until 2000 that the Qualifications Framework took a more central place in the overall scheme of quality assurance for higher education. A Ministerial Council on Education, Employment, Training and Youth Affairs (MCEETYA) brings together the various State and

Commonwealth ministries and agencies to co-ordinate policies and the development of national agreements. In 2000, MCEETYA agreed on an Australian Higher Education Quality Assurance Framework with five elements (Figure 1) including the Qualifications Framework. The two significant new elements were the establishment of the Australian Universities Quality Agency (AUQA), and formulation of the National Protocols for Higher Education Approval Processes.

**Figure 1. The Australian Higher Education Quality Assurance Framework**



### ***AUQA and the Qualifications Framework***

AUQA conducts quality assurance audits of higher education institutions on a cyclical basis, and, importantly, it also audits and reports on the accreditation bodies of the states and territories. AUQA is required to report on the ‘relative standards of the Australian higher education system...including their international standing’ and to address the issue of the maintenance, deterioration or improvement of academic standards (Object 4, Appendix 1). To do this, AUQA looks at the ways in which institutions set and access standards including moderation methods, formal benchmarking (including international benchmarking), and less structured inter-institutional comparisons (including international comparisons).

The Qualifications Framework provides AUQA with a clear reference point for national standards to the extent that they cover the basic expectations of awards in terms of learning outcomes, as well as accreditation processes and the operations of the agencies that conduct the accreditations. AUQA's connection to the Protocols and academic standards comes through its role in the audit process of assessing whether a university's objectives are consistent with the established criteria for a university. AUQA also checks to verify that agencies involved in the accreditation process of non self-accrediting institutions are applying the Protocols correctly.

MCEETYA advises AUQA on new and emerging issues related to the Qualifications Framework. It has, for example, suggested to the Quality Agency, that it might take a more active role in auditing universities against a set of 'Good Practice Principles for Credit Transfer and Articulation' it developed and adopted. This does not enable MCEETYA, AUQA or AQF to set standards but it does provide a check against university practices that might inflate the value of one qualification or dilute the standards of another in the process of determining their relative merit for selection purposes.

### ***The Protocols and the Qualifications Framework***

The Protocols are the key regulatory mechanism for defining and accrediting universities in Australia. They have the express purpose of ensuring that consistent criteria and standards are used in the approval process for new institutions and course. The five Protocols codifying the arrangements for the establishment and accreditation of new higher education providers concern the:

1. Establishment and recognition of universities
2. Recognition of overseas higher education institutions
3. Accreditation of higher education courses to be offered by non-self-accrediting institutions
4. Delivery arrangements involving other organizations
5. Endorsements of courses for overseas students

Protocol 1 is of most interest in this context, and the source of ongoing debate. It spells out the criteria for recognition as a university. This includes offering a broad range of disciplines, engaging in research, and having a culture of sustained scholarship. The term university is now protected under a Commonwealth Corporations Act (2001) but it is the States that can take action to prevent and penalise 'degree mills' which may be falsely presenting themselves as Australian universities. The Australian strategy has been to define what makes a university and then to grant that institutions the right to be self-accrediting. There is generally no regular re-accreditation process.

## Impact of the Framework

The Qualifications Framework was first developed with the brief to ‘protect’ the qualifications guidelines and to ‘promote and monitor’ national implementation of the Framework. The passive nature of the language is telling. While the Advisory Board can advise, protect, guide, register, inform, promote and monitor, it is not in a position to directly initiate new qualifications, or to set academic standards. It has a role in responding to initiatives from providers or from governments.

There has been no serious opposition to the Framework from the higher education sector, and it has been uncontroversial, mainly because it is relatively weak in character (Young 2003:226). It serves the purpose of informing students as to what different qualifications mean relative to others, and it provides something of a gatekeeper role for institutions introducing new courses. Like the national qualifications frameworks of Ireland and Scotland, as Young suggests, it has limited and indirect power, and while comprehensive, the higher education component is effectively controlled by the universities through their peak body, the Australian Vice-Chancellors’ Committee (AVCC).

It is noteworthy that while the AVCC does not appear in the Quality Framework it is typically referred to as having a long-standing role in developing guidelines relevant to quality assurance, for example, a ‘Code of Practice’ for maintaining and monitoring academic quality and standards in higher degrees. In practice, there is tacit agreement at the level of the Australian Qualifications Framework Advisory Board that the qualifications descriptors are effectively ‘owned’ by the universities through the membership of the AVCC on the Advisory Board. The AVCC provides advice and comment on the Framework descriptors and proposals for new qualifications.

The Framework provides a useful codification and reference point. However, with governments in Australia becoming increasingly interventionist in the higher education sector, the Framework is potentially available for closer regulation and prescription of institutions. It should be remembered that the Commonwealth has a number of other quality assurance processes under its auspices such as the national graduate course experience survey. It also publishes a range of comparative data about the characteristics and performance of universities.

The Framework appears to have been sufficiently robust to create a reasonable level of consensus. Dealing with the diversification of providers, and the more open pathways and flexible systems of course delivery, will present an ongoing challenge. The capacity of the Framework to adapt to rapid change will soon be tested by the Commonwealth announcement, in November 2005, of a new wave of reforms to shift the entire Australian system towards a US style of undergraduate teaching-intensive universities and graduate schools in the research-intensive universities. The government plans follow the University of Melbourne’s declaration of its intention to radically restructure its courses and profile along the lines of US research-intensive universities. It will shift over the next decade to limited undergraduate general degrees and postgraduate professional and research coursework programs. Both the national and Melbourne responses are driven by the need to boost the international recognition of Australian degrees.

### *Introduction of the Associate Degree*

The recent introduction of the Associate Degree provides an example of the limited extent to which the Framework can contribute to the assurance of quality. The Associate Degree is of two years duration following the end of secondary school, that is, post-year 12. Again, it is the universities that have the authority to set the objectives and academic requirements of the courses. There is likely to be a high level of permeability in the boundaries between the Associate and Bachelors degree and between Associate Degree and the Advanced Diploma shown in Table 1.

The characteristics of the learning outcomes for the Associate Degree specified by the Framework include the ‘acquisition of the foundational underpinnings of one or more disciplines’ to emphasise that the degree is ‘generally but not exclusively articulated with relevant Bachelor Degree programs. The degree is also intended to provide a broad-based point of entry to employment especially in the associate professional occupations.

The Framework suggests that the distinctive features of the Associate Degree include the foundational research-based knowledge of an academic discipline and the broad, often multidisciplinary content. The critical point with respect to academic standards, from the higher education perspective is that the Associate Degree may also be offered by technical and further education colleges and by private training organizations, although it does not appear in the vocational section of Table 1. The nature of the research base is open to interpretation. The relationship between the Qualifications Framework and the Protocols does not appear to be helpful on this point. The approval processes do not address the issues of academic standards in the sense that the non self-accrediting provider of the course has to meet the same expectations as for universities.

As the Guthrie Review (2005) pointed out, Protocol 3 is ‘silent on the requirements for scholarship and research to underpin the course approved as is the expectation at Australian universities’. It notes that the States and Territories have taken different stances on this issue with some assessing the qualifications of staff as a means of meeting the requirements, while others expect evidence of staff research activity. The question is then raised about the absence of a clear distinction between university education and higher education providers in Protocol 3.

The Guthrie Review (2005:22) also identifies the potential for undermining both the Qualifications Framework, and the awards themselves, as a result of the different historical arrangements across the States and Territories. In some States, some higher education awards are actually accredited by vocational and training processes. This clearly undermines the notion that the Protocol 3 assures that courses are of comparable standards with Australian universities. The fact remains that there is still a great deal of variation across the States and Territories in the approvals process and criteria and ‘there is a long way to go to achieve consistency’ (Guthrie 2005:9).

One of the enduring problems embedded in such an arrangement is that the ability of the universities to maintain standards is not really tested closely by the Framework or by the Protocols. The Guthrie Review (2005:6) makes the usual assumption that the universities have ‘long standing traditions about required standards for awards and established academic processes to monitor those standards’. It is the task of the third ‘leg’ of the quality assurance framework, AUQA, to audit the extent to which this occurs, but not the actual standards of student learning outcomes.

### *Lifelong learning*

As part of the national strategy for lifelong learning, another test of the impact of the Framework arose from a suggestion that it could be used as the basis for a customised portfolio approach that recognises modules of learning completed, through different providers at different times. It was argued, hypothetically, that a student might take a mix of subjects from diverse providers and the ‘total package’ could be recognised as a credential such as a Bachelor Degree.

This fairly unlikely scenario provided a fundamental test of the role of the AQF as a policy instrument to assure quality. A key element of the descriptor for the Bachelor Degree is ‘the acquisition of a systematic and coherent body of knowledge’. The portfolio proposal raised the question of how significant the coherence of a degree program needs to be, and how that is addressed by quality assurance processes.

The Framework Advisory Board responded that while flexibility in pathways is central to the recognition of prior learning in all sectors, the portfolio notion was likely to devalue the degree awarded. It points to the importance of establishing appropriate assessment guidelines based on agreed national standards for the qualification level. All that the Framework can do is to verify indirectly that the qualifications awarded in higher education have taken cognisance of the Framework descriptors and learning outcomes appropriate to the level of the award. To close this gap, the Advisory Committee argued that the only way to deal with a pathways or portfolio approach is to establish an assessment authority that would be responsible for assessment-only pathways or portfolios.

### **Costs**

The Qualifications Advisory Board has a modest secretariat with a budget around US\$400,000 per year. Most of the cost of accrediting new non-self-accrediting providers is borne by the State agencies. This process does not occur very often and the cost of each exercise is therefore not readily available.

### **Conclusions**

The broad educational goals of the Australian Qualifications Framework are common to most national qualifications systems. That is, they create transparency for the users, minimise barriers to progression, and maximise access flexibility and portability between different sectors (Young 2003:224). There are clear deficiencies and limits to the impact of national qualifications frameworks as quality assurance instruments (Blackmur 2004, Young 2003).

In the Australian case, the profile of the Framework has been raised beyond its initial goals by the quality assurance function. The potential of the Framework as a policy instrument to monitor

and improve academic standards is limited. It is highly unlikely that universities will allow external bodies to dictate standards. They are, however, likely to take the initiative and to more systematically go about the business of monitoring academic standards internally. If nothing else, the incentive to gain accreditation from overseas organizations will prompt closer attention to these processes. Likewise, the pressure on policies and processes to ensure standards across the sector will increase to match international practice as competition for the best and brightest students develops.

While the Australian Qualifications Framework is limited in its capacity to directly ensure academic standards, it is now part of a suite of measures and organizations that MCEETYA and the Commonwealth can call into play at a national level. To that extent it provides the basis for further development as the Australian Higher Education goes through its next stage of major reform towards course structures designed to ensure international recognition.

## Resources for Policymakers

### *General links*

Australian Qualifications Framework <http://www.aqf.edu.au/>  
 Australian Universities Quality Agency <http://www.auqa.edu.au/>

### *Documents*

Australian Qualifications Framework Implementation Handbook (2005)  
<http://www.aqf.edu.au/pdf/handbook.pdf>

Assuring quality in Australian higher education, Department of Education Science and Training  
[http://www.dest.gov.au/sectors/higher\\_education/policy\\_issues\\_reviews/key\\_issues/assuring\\_quality\\_in\\_higher\\_education/default.htm](http://www.dest.gov.au/sectors/higher_education/policy_issues_reviews/key_issues/assuring_quality_in_higher_education/default.htm)

*Backing Australia's ability* <http://www.backingaustraliasfuture.gov.au/>

Higher Education Report 2004-06  
[http://www.dest.gov.au/sectors/higher\\_education/publications\\_resources/profiles/higher\\_education\\_report\\_2004\\_2006\\_triennium.htm](http://www.dest.gov.au/sectors/higher_education/publications_resources/profiles/higher_education_report_2004_2006_triennium.htm)

## References

- Anderson, D. (2001) *When somebody's watching: Perspectives on academic audit*. Victoria University Public Seminar 6 July 2001: Melbourne
- Australian Qualifications Framework Implementation Handbook (2005)  
<http://www.aqf.edu.au/implem.htm>
- Blackmur, D. (2004) Issues in higher education quality assurance, *Australian Journal of Public Administration* 63:2 June pp 105-116.
- Department of Education Science and Training (2005) Building better foundations for higher education in Australia: A discussion about re-aligning Commonwealth-State responsibilities  
[http://www.dest.gov.au/sectors/higher\\_education/policy\\_issues\\_reviews/key\\_issues/commonwealth\\_state\\_responsibility\\_higher\\_ed.htm](http://www.dest.gov.au/sectors/higher_education/policy_issues_reviews/key_issues/commonwealth_state_responsibility_higher_ed.htm)
- Guthrie, G., Johnston, S. and King, R. (2005) Further development of the National Protocols for Higher Education Approval Processes. DEST.  
[http://www.dest.gov.au/sectors/higher\\_education/policy\\_issues\\_reviews/reviews/guthrie\\_review/www](http://www.dest.gov.au/sectors/higher_education/policy_issues_reviews/reviews/guthrie_review/www)
- McInnis, C. (2003) 'Touchstones for excellence: assessing institutional integrity in diverse settings and systems.' In De Corte, E. (Ed) *Excellence in Higher Education*. Portland Press: London.
- Young, M.F.D. (2003) National qualifications frameworks as a global phenomenon: a comparative perspective. *Journal of Education and Work* 16:3 September pp223-237