



Review of the Australian Qualifications Framework

Discussion Paper

DECEMBER 2018

The Australian Qualifications Framework (AQF) Review Panel wishes to draw on the considerable expertise and experience that has developed across a broad range of organisations and individuals in relation to the Review's [Terms of Reference](#).

In its discussion paper, the Panel has opted to provide to organisations and individuals some of the Panel's initial thinking about the case for change to the AQF, but invites differing analysis, conclusions and proposals.

To make a submission to the Review, please email this form to AQFReview@education.gov.au by 15 March 2019.

Please note that the Australian Government Department of Education and Training will not treat a submission as confidential unless requested that the whole submission, or part of the submission, be treated as such.

Please limit your response to no more than 3000 words.

1. In what ways is the AQF fit, or not fit, for purpose?

The AQF is fit for purpose in most respects. Note that making drastic changes will impact upon those who hold existing AQF qualifications and will cause disruption.

2. Where the AQF is not fit for purpose, what reforms should be made to it and what are the most urgent priorities? Please be specific, having regard to the possible approaches suggested in the discussion paper and other approaches.

The AQF qualifications do not sufficiently clarify where they "sit" in terms of education and VET.

As a result, we have schools delivering Diploma qualifications and this impacts upon an employer's confidence in the qualifications of all those who hold a Diploma. School students simply do not have the life and work experience to undertake qualifications at this level.

Certificate I and II are really "prepare for work" qualifications. Holding such a qualification is not likely to influence an employer to recruit a candidate except in a junior/trainee position – as has been pointed out in the discussion paper.

There is a major difference between the way that universities conduct training and assessment, compared with VET. I have over 90 trainees undertaking TAE40116 Certificate IV in Training and Assessment. A significant number of these hold a degree or higher degree. I am constantly receiving feedback that the TAE course and evidence requirements are more difficult and challenging than their degree was.

This is because universities focus on knowledge and research. VET focuses on performance – the actual ability to perform the tasks to the standard required.

Review of the AQF is an opportunity to improve the current quality of vocational education (which is my concern) and perhaps also to improve the quality of school and university education by ensuring that the relevant levels are delivered by those who have the requisite expertise.

For instance:

Review the School Certificate, Certificate I and Certificate II. Align these so that the schools can deliver to Certificate II but not above and ensure that the relationship between them is clearly stated.

The overlap with VET should then be at Cert II level. This is necessary to train adult learners (unemployed and migrants) for a “prepare for work” qualification so they can be recognised by employers as equivalent to a school leaver.

Note re trade qualifications at Cert III. There is no reason why a school student should not commence an apprenticeship but this should be with a VET RTO. It is inappropriate for a school teacher without the trade experience to be delivering or assessing such qualifications.

Certificate III through to Diploma should only be delivered by a VET RTO – not universities. Universities are entering this space for financial reasons, to attract overseas students, but they don't have the systems or training methods to deliver these qualifications effectively. VET is not academic. Knowing something doesn't demonstrate that you can do it.

The overlap between VET and universities should be at the level of Advanced Diploma. By the time a student undertakes such a qualification they should already have lower VET qualifications and/or considerable vocational experience.

Qualifications above Advanced Diploma should only be delivered by universities as they are primarily academic.

This is a simple change which would ensure quality outcomes at all levels. It is just a case of stating the type of organisation which can deliver at each AQF level.

3. In relation to approaches suggested by the Panel or proposed in submissions or through consultations, what are the major implementation issues the Review should consider? Please consider regulatory and other impacts.

In relation to volume of learning, it is certainly appropriate to use hours rather than years.

The problem is to ensure that VET qualifications do not become curriculum-based. In VET particularly, we need to be flexible.

As stated in the discussion paper, the demand is for shorter time frames. Returning to the issue with TAE40116, this qualification is equivalent to a licence to practice as a

trainer/assessor. Many of my TAE students have already been offered work with an RTO (private or TAFE) but must hold TAE40116 before they can be employed. For various reasons outside the terms of reference of this review, the qualification cannot be achieved in less than 6 months. By that time the job is no longer open.

Note: the main reason for this problem is the way the units of competency have been written – which is not the concern of this review. However, stating that a Cert IV takes 6-12 months in the AQF gives ASQA a reason to find a non-compliance if an individual manages to complete in a shorter time.

Therefore, I strongly recommend that the AQF should not mandate a time frame but instead continue to state it as “typical” – adding that this applies to a learner with no prior experience or knowledge.

It is ASQA’s responsibility to police the system and ensure the quality of outcomes. Those of us in the VET system are fully aware which RTOs are only interested in throughput and profit but they are still operating – and this includes RTOs who were given scope for TAE40116. This problem will not be resolved by mandating a volume of learning. I note from the discussion paper that ASQA wishes to mandate the time more stringently, but this is a result of their failure to weed out those RTOs we call “tick and flick merchants”. It will not be resolved by turning VET into a curriculum-based system.

Other

There are many serious issues facing both the education and VET system. The AQF is the least of the problems.

A complete review is needed, rather than a Band-Aid approach just looking at the AQF.

I would ask that whatever the outcome of this review, it should aim to reduce complexity.

Also, please remember that if you make drastic changes, every single trainer/assessor will need to re-train. Every RTO delivering TAE40116 will need to re-write their resources and revise their training and assessment strategies. This is a huge cost.