



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.

Respondent name

Ian McLeod

Respondent organisation (where relevant)

MTO Consulting

MTO Training g PNG LTD NTC 191

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

The AQF is fit for purpose in most respects. I do note that making drastic changes will impact upon those who hold existing AQF qualifications and will cause disruption. The largest area of change is required in the international perception by the Australian Regulator (ASQA) and our close neighbours of PNG who do possess a PNGQF 2016. This means in reference to the (AQF Review – Terms of Reference) 1. iv. reflect international good practice there is work to be done to bring the AQF in line with the later version of the PNGQF 2016.

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 adequately clarify how they “fit” in terms of education and VET.

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 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.

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 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.

Example:

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 clarified clearly.

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

Trade qualifications at Cert III:

There is no reason why a school student should not commence an apprenticeship but this must 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 a candidate or worker 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.

Volume of learning/Amount of Training:

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. The issue with a certificate IV Qualification which is stated in the AQF to be of duration of 6 to 24 months!

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 Certificate IV takes 6-24 months in the AQF gives the Australian Regulator (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. It will not be resolved by turning VET into a curriculum-based system.

Other

A focus needs to be on what is and has happened with changes to the Regions QF systems and most certainly ensure an alignment with our closest neighbour PNG is mandated. The PNG QG 2016 is quite a robust document which we as a PNG RTO follow closely and offers more flexibility than the AQF of Australia.

I am more than happy to be involved with this information as I have a close relationship with PNG as an RTO.