

# NSW Government Submission to the Australian Qualifications Framework Review

PREPARED BY THE NSW GOVERNMENT

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# Executive Summary

In the NSW Government's view, the Review Panel should:

- I. Improve the clarity of the Australian Qualifications Framework (AQF) and make it easier to understand by:
  - o using plain English as far as possible;
  - o removing duplication between AQF level descriptors and qualification type descriptors;
  - o providing a clear distinction between levels and qualification types; and
  - o relating learning outcomes for qualifications to broad job context and relevant work skills.
- II. Revise the descriptor of skills in the AQF to better incorporate and define enterprise and social skills. However, it is undesirable and impossible to have an exhaustive list of these skills. How these skills are delivered and assessed should be considered in education and training product development.
- III. Consider options for addressing the non-sequential or non-linear dimensions of 'skills' and 'application of knowledge and skills' across the AQF levels. In practice, the differences between some AQF levels in 'skills' and 'application of knowledge and skills' may not be distinctive or neatly sequential. In practice, they may overlap between levels. The dimension of 'application of knowledge and skills' should be supported by empirical evidence.
- IV. Review the description of the purpose of Diplomas at AQF Level 5 to reflect the differences in purposes and outcomes of diploma programs between the Vocational Education and Training (VET) sector and the Higher Education sector. Higher Education Diplomas are often used as a pathway to degree programs or as articulation points for tertiary pathway programs, while VET Diplomas are recognised by industry and linked to a specific occupational outcome.
- V. Review the qualification types at AQF Level 6 – Advanced Diploma and Associate Degree – to ensure the descriptors are clear enough to distinguish between the two. There is increased use of an Associate Degree as a qualification that blends Higher Education foundation content with extended area specific knowledge and this differs from the Advanced Diploma qualification.
- VI. Retain the 'volume of learning' descriptor as guidance only. Use hours instead of years as the unit of measurement and indicate clearly that the amount of time needed varies across qualifications in different industries and between students with different backgrounds. Explore options to provide clearer guidance on the likely time spent in training for a new industry/discipline entrant to achieve competency.
- VII. Revise the specification for the Senior Secondary Certificate of Education (SSCE) to better reflect the broad range of AQF levels that students may be exposed to, and that the SSCE can prepare students for further study at a number of different AQF levels. Also ensure representation/placement of SSCE in the AQF does not give the impression that it is at the bottom of the hierarchy, i.e. lower than AQF Level 1.
- VIII. Explore options for recognising the diverse outcomes, relative to the AQF levels, achieved by secondary school students in the individual courses undertaken as part of the SSCE. This could make it easier for employers, registered training organisations (RTOs), universities and other interested parties to understand and measure outcomes from a SSCE course relative to qualifications at other levels.

- IX. Provide a mechanism for how shorter-form credentials could be recognised within the AQF. This could be achieved either through grouping these credentials into a qualification type and/or acknowledging in the AQF Pathways policy the importance of these credentials as building blocks towards full AQF qualifications. However, shorter form credentials should not detract from the value of full qualifications for individuals and employers.
- X. Provide guidance to education and training providers in the AQF Pathways Policy on how to facilitate alignment of unaccredited shorter-form credentials to the learning outcomes of AQF qualifications, including clear documentation of the quality assurance process RTOs have adopted.
- XI. Strengthen the role of the AQF Pathways Policy as a national sector-wide policy that sets a clear objective of facilitating and promoting pathways between qualifications, across education sectors and into the labour market. The AQF Pathways Policy should not be revised or downgraded to become guidance only.
- XII. Explore the benefits of a credit point system in providing a stronger framework for movement between education sectors, noting that the cost in the VET sector of translating units of competency is likely to be high.
- XIII. Advise the Commonwealth Government to establish and maintain a national credit transfer register which provides articulation and pathways information including credit points awarded for the courses/modules. The Commonwealth is in the best position to take on this role as the custodian should be national focused, sector neutral, and have a clear mandate to promote pathways.
- XIV. Develop advice for the Commonwealth Government on governance arrangements needed to ensure that qualifications developed are correctly aligned with the AQF level assigned.

# Response to Discussion Paper Questions

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

The AQF is the national policy for regulated qualifications in Australian education and training. It incorporates the qualifications from each education and training sector into a single comprehensive national qualification framework.

The AQF has provided a good conceptual foundation and national framework for the consistency and portability of qualifications. In NSW, the AQF underpins key legislation, contractual requirements for RTOs and training policies in NSW. These include the *Apprenticeship and Traineeship Act 2001*, the NSW Quality Framework, and the contract, operating guidelines and related policies for providers approved to deliver government-subsidised training under Smart and Skilled. The NSW Department of Fair Trading may also refer to the AQF in setting licensing requirements.

## AQF structure

The current AQF has 10 qualification levels and 14 qualification types. The current levels and qualification types are widely recognised by the general public.

The most widely used AQF qualification nationally is Certificate III, which is considered an entry level qualification for a range of occupations and is linked to licensing of many trades. AQF Level 1 and 2 qualifications have been used to provide foundation skills to prepare for labour market entry.

## *AQF Level 1 and 2 qualifications have an established place in NSW*

Certificates I and II play an important role in supporting disadvantaged learners' entry to education and vocational fields at an appropriate level for people with limited schooling, including refugees, Aboriginal people in remote communities, new migrants and homeless people. Removing AQF Level 1, or collapsing Levels 1 and 2, could have significant equity implications.

In 2017, TAFE NSW had almost 14,000 enrolments at Certificate I level.<sup>1</sup> Most Certificate I qualifications were targeted to improve students' access or preparation for vocational pathways, work and training, English language skills or general education, and were not prevocational courses in a particular sector.

While VET qualifications at AQF Levels 1 do not have well defined employment outcomes, some are recognised as a valued pre-apprenticeship pathway.

Qualifications at Level I and II have an established place in the NSW school curriculum. They have particular value for young people 15 to 16 years of age, who may complete Certificate I and II courses as an introduction to vocational study, and then continue to higher-level qualifications in upper secondary years. Achievements in lower-level awards build confidence for students and families in the VET system and post-school VET pathways.

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<sup>1</sup> TAFE NSW corporate data

In 2018, there were 3,885 enrolments in Certificate I qualifications from students in NSW government schools, with 67 per cent of these enrolments from students outside of metropolitan Sydney<sup>2</sup>.

Studied as part of schooling, Certificate I qualifications in trades such as automotive, cookery, construction and engineering in particular, play an important role for rural students in providing access to industry standard facilities, and the incentive for these students to undertake the travel required to study higher-level qualifications post-compulsory school and/or after school.

Certificate I qualifications also play an important role for students with special needs in Juvenile Justice Centres. They help these students build skills and confidence in preparation for further study.

### ***Demand for Associate Degrees at AQF Level 6 is increasing***

Compared to AQF Levels 1 to 5, Level 6 Advanced Diploma and Associate Degree qualifications are less used. Nevertheless, take up is increasing.

In 2017, nationally there were 73,750 enrolments in a VET Advanced Diploma, a 10.8 per cent increase from 66,580 in 2016<sup>3</sup>. Similarly, there were 11,185 domestic Higher Education students undertaking an Associate Degree, a 3.6 per cent increase from 10,801 students in 2016<sup>4</sup>.

The NSW Tertiary Pathways project has demonstrated the value of an associate degree as a para-professional qualification in improving outcomes for students, employers, industry and the tertiary education sector by:

- bridging the gap between Higher Education and VET study through providing a supported pathway from Certificate (AQF Levels 2, 3 and 4) to Bachelor Degrees (AQF Level 7)
- blending Higher Education foundational content within an area of previous VET study and work experience, providing credit into a number of related Bachelor Degrees
- providing an industry recognised qualification and pathway exit point, often in an area where an AQF Level 7 qualification does not exist (nor is necessarily required). Aged care and civil construction management are examples of high demand areas where there are no full Bachelor Degrees.

### ***Senior Secondary Certificates of Education (SSCE) not aligned with an AQF level is appropriate but issues remain***

Australian secondary school students may gain knowledge and skills across several AQF levels. This may be a result of differences between the arrangements for each state and territory, and also the result of subject selection by each individual student. This is further complicated by the fact that students can choose different combinations of vocational education and general education subjects. Therefore there is general support from the school sector and boards of studies that SSCE should not be aligned to a specific AQF level.

However, some employers and RTOs find it difficult to understand and measure the outcomes for an individual with a SSCE relative to other AQF qualifications. SSCE holders are also unclear how SSCE prepares them for further study at different AQF levels.

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<sup>2</sup> NSW Department of Education data

<sup>3</sup> NCVER VOCSTATS, Total VET Students and Courses, VET Program Enrolments 2014-2017, accessed 1 February 2019

<sup>4</sup> Australian Department of Education and Training, Selected Higher Education Statistics, student data, 2017 Section 2, Table 2.2 All Domestic Students by Age Group and Broad Level of Course, Full Year 2017.

### ***Shorter-form credentials (accredited or unaccredited) not included in the AQF provide short sharp training to meet immediate skills needs***

Shorter-form credentials are often used to address immediate and specific skills needs. Currently a wide range of shorter-form credentials are not included in the AQF. Many of these shorter-form credentials have existed for a long time and provide timely training options to address emerging skills needs, respond to rapid technological changes or retrain a workforce undergoing industry restructure.

Some shorter-form credentials such as skills sets and part qualifications from training package are nationally accredited and could be used to build full VET qualifications. While there might be some confusion over the status of the numerous shorter-form credentials in the market place, there is limited empirical evidence that the current arrangements are not meeting the skills needs of employers and students, or that there is substantial demand to build these credentials into a formal qualification.

However, the growth in the different types of shorter-form credentials does warrant consideration of incorporating them into the AQF, for the purpose of recognising their value and providing clarity to the public about how they may relate to the AQF.

### **AQF taxonomy**

The AQF taxonomy specifies the purposes of each AQF level and qualification type, the required learning outcomes, classified under the dimensions of 'knowledge', 'skills', application of knowledge and skills', and the 'volume of learning' typically needed to attain the qualification.

### ***The AQF taxonomy would benefit from using plain English and removing duplications and inconsistencies***

The language used in the AQF as well as associated policies could be 'refreshed' to reflect contemporary plain English protocols. This would improve the readability of the AQF for the wide range of intended users – students, parents and graduates; schools, training providers and universities; industry and professional bodies; licensing and regulatory bodies; professional associations and unions. These users refer to the AQF for a range of purposes, including course development, course selection and education and training activity regulation.

Duplication and some inconsistencies between AQF level descriptors and qualification type descriptors also affect readability.

### ***Descriptors for the dimension of application of knowledge and skills are not distinctive or hierarchical between some levels***

A substantial issue is that the current AQF does not clearly define or differentiate between the learning outcomes expected at each level. The differences in 'skills' and 'the application of knowledge and skills' may not be distinctive or neatly sequential between some levels. For example, graduates of Level 3 should demonstrate the application of knowledge and skills 'in contexts that include taking responsibility for own outputs in work and learning...and taking limited responsibility for the output of others within established parameters'. This is not so different from the description for Level 4 graduates, who will have 'responsibility for own functions and outputs, and may have limited responsibilities for organisation of others' (AQF, pp. 14-15). There may be a case, based on further research of current workplace and learning requirements, to allow for overlap in this dimension between levels, rather than over specifying the definition in a way that is not meaningful.

Autonomy being exercised at work on successful completion of studies was raised in the Discussion Paper to illustrate the non-sequential nature of the application of knowledge and skills. Increasingly employers expect VET and higher education graduates to be capable of exercising a

high degree of autonomy, judgment and adaptiveness. An apprentice finishing a Certificate III qualification to become a tradesperson may routinely exercise a higher level of autonomy than a recent Bachelor Degree graduate in some fields.

### ***Descriptors of skills in the AQF should better incorporate enterprise and social skills***

The AQF currently sets out certain non-discipline specific generic skills and incorporates several generic skills in the level and qualification descriptors.

While there is increasing recognition of the value of enterprise and social skills across industry sectors, there is no accepted list of these skills, and the relevance of each skill in the workplace may vary across industry sectors. Their value is likely to continue to change into the future, in line with the changing nature of work.

Despite their usefulness across industry sectors, the application of these skills can vary significantly depending on the specific context. It may be more appropriate that these skills are developed and applied in specific contexts rather than generically.

### ***The purpose and use of dual sector qualifications need to be clarified***

The dual sector qualifications at AQF Levels 5, 6 and 8 can cause confusion for training providers and regulators.

The Discussion Paper acknowledges the differential treatment of Higher Education Diplomas and VET Diplomas in terms of credit transfer or their use as a basis for entry into a higher qualification. It comes down to how the purposes of the qualifications should be defined. VET Diplomas often lead to specific occupations and meet industry needs, while many Higher Education Diplomas are often used as pathways for entry into higher level studies

### ***The concept of and descriptor for 'volume of learning' is problematic***

Competency-based training and assessment does not align with a 'volume of learning' concept. Further complicating the issue is the use of different time-defining concepts. For example, the Standards for RTOs refer to 'amount of training'; VET reporting under AVETMISS has references to 'nominal hours'; many VET providers use 'delivery hours' and in NSW there are HSC indicative hours<sup>5</sup>.

'Year' as a unit of measurement is becoming out of date given the increased use of non-traditional delivery modes, such as online learning, blended modes of delivery and studying part-time.

Despite its problematic nature, 'volume of learning' may be useful for regulators as an indicator of whether learning and assessment practices are likely to be sufficient at each AQF level, and can signal the depth of a qualification to students and employers.

From a quality assurance perspective, the current 'volume of learning' descriptor does not provide clear guidance on what constitutes an appropriate minimum volume of learning at each AQF level. Given that the volume of learning could be vastly different between qualifications at the same AQF level (e.g. a Certificate III in Financial Services can be delivered in one year, whereas a Certificate III trade apprenticeship may take up to four years of training), and within qualifications for different types of learners, there are concerns with how regulators are using 'volume of learning' in their audit activity and its impact on RTOs.

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<sup>5</sup> For VET courses, HSC indicative hours for unit credit towards the HSC is assigned to each unit of competency within an HSC VET course (credit weighting). Students need 22 credit units in total for an HSC (1 credit unit = 60 indicative hours). HSC courses are typically 240 indicative hours (4 credit units). Unit of competency HLTAID003 Provide first aid is allocated 20 HSC indicative hours. It has a 'worth' of one third of an HSC credit unit regardless of whether it takes an individual additional or fewer hours to achieve competence.

## AQF Qualification Pathways Policy

### *The AQF Pathways Policy can be better shaped to support movements between AQF levels*

Although the current AQF Qualifications Pathways Policy is not the main driver of pathways practice, it remains a useful policy to facilitate movements between AQF levels. Currently there is significant cost and effort to negotiate credit and articulation arrangements particularly between VET and Higher Education providers.

For example, at TAFE NSW, a full-time dedicated resource is required to manage pathways development work, which involves negotiating and managing articulation agreements, mapping courses, monitoring the credit transfer database and updating agreements to reflect changes in Training Packages and Higher Education courses. New and innovative pathways are particularly resource intensive and can take several months to develop. The amount of work required varies based on the nature of the institutional relationships, as well as the resources available to establish and maintain pathways.

There is scope to further strengthen the policy to better support pathways practices.

### Assignment of training package qualifications to the AQF level

Training package products, including AQF qualifications, are approved by the Australian Industry and Skills Committee, who are advised by Industry Reference Committees. However, there isn't a clear moderation process that ensures that qualifications developed are correctly aligned to the assigned AQF level and that learning outcomes of qualifications at the same AQF level are comparable between qualifications across industry sectors.

There can be significant disparities in skills and the application of knowledge and skills required to complete some qualifications at the same AQF level. In particular, there are significant differences between some Certificate III qualifications. Some of these differences can be attributed to whether the qualification is normally studied as part of an apprenticeship. Differences can also be attributed to varied industry or occupational requirements, or the specifications of industrial awards.

## What reforms should be made to the AQF and what are the most urgent priorities?

### AQF taxonomy

In the NSW Government's view, the Review Panel should:

- I. **Improve the clarity of the AQF and make it easier to understand by:**
  - o using plain English as far as possible;
  - o removing duplication between AQF level descriptors and qualification type descriptors;
  - o providing a clear distinction between levels and qualification types; and
  - o relating learning outcomes for qualifications to broad job context and relevant work skills.

#### *Improve clarity and readability of the AQF*

- The language of the AQF is overly technical and not easily accessible in parts. For example, the AQF includes relevant policies in full, including the AQF Qualifications Issuance Policy and the AQF Qualifications Pathways Policy, which may not be pertinent to all users. There are opportunities to improve the readability of the AQF by incorporating plain English wherever possible.
- Readability of the AQF is further affected by a lack of clarity in relation to AQF level descriptors and qualification type descriptors. Duplication between level and qualification descriptors should be removed, as proposed in the Discussion Paper.
- The AQF should be revised to relate learning outcomes for qualifications to broad job context and relevant work skills. Specifying the autonomy and responsibility achieved from completing VET sector qualifications, which sit at the middle levels of the AQF (such as trade qualifications at Level 3 and Advanced Diplomas at Level 6), would provide more visibility and increase awareness of the work-related outcomes and benefits of VET courses. This might help address community perceptions that VET sits at the lower end of a hierarchical qualifications ladder.
- Incorporating descriptors for work relevant skills would be relatively easy to implement, as VET qualifications are competency-based and developed to address industry/work needs.
- Inclusion of autonomy and responsibility descriptors would also provide improved guidance on the delivery of enterprise and social skills in the AQF (Discussion Paper area of change 4.2).

In the NSW Government's view, the Review Panel should:

- II. **Revise the descriptor of skills in the AQF to better incorporate and define enterprise and social skills. However, it is undesirable and impossible to have an exhaustive list of these skills. How these skills are delivered and assessed should be considered in education and training product development.**

#### *Better reflect the importance of enterprise and social skills*

- The AQF should acknowledge the increasing importance of enterprise and social skills and the descriptor of skills in the AQF should be revised to better reflect this.

- Research from the NSW Department of Education's *Education for a Changing World* initiative examining the strategic implications for education of developing technologies has found that skills such as digital literacy and so-called 'soft' social and enterprise skills will be increasingly relevant in an artificial intelligence (AI) augmented future.
- However, there is no clear consensus on which enterprise and social skills will be required, how they should be defined or how the demand for these skills will vary across industries. Further, social and enterprise skills are sector-specific and can change over time. The AQF should not attempt to prescribe an exhaustive list of what skills and attributes students may be expected to acquire at different qualification levels across a variety of fields of study.
- Research undertaken for *Education for a Changing World* indicates that there may be merit in including computational thinking (how algorithms work and their potential biases) alongside other important skills such as critical and creative thinking that are currently included in AQF level skills descriptors.
- Social and critical thinking skills are best developed through mastery of content, and their application is most usefully considered in context-dependent ways. If a skill is found to be relevant for an industry or occupation, it should be possible to fairly and reliably assess on the basis of performance or knowledge within a unit of competency (i.e. within Training Packages, not the AQF itself).

**In the NSW Government's view, the Review Panel should:**

- III. Consider options for addressing the non-sequential or non-linear dimensions of 'skills' and 'application of knowledge and skills' across the AQF levels. In practice, the differences between some AQF levels in 'skills' and 'application of knowledge and skills' may not be distinctive or neatly sequential. In practice, they may overlap between levels. The dimension of 'application of knowledge and skills' should be supported by empirical evidence.**

***Consider options for creating separate dimensions within the AQF for 'knowledge', 'skills' and 'application of knowledge and skills'***

- The AQF level descriptors include distinctive learning outcome descriptions for 'skills' and 'the application of knowledge and skills'. However, in practice these learning outcomes are not necessarily distinctive between each level, nor are they necessarily neatly sequential from one AQF level to the next. Attempting to make distinctions at each level across all learning outcomes may not be appropriate and lead to arbitrary distinctions between levels. The dimension of 'application of knowledge and skills' should be supported by empirical evidence, as it is very context specific, particularly in a workplace context.
- Autonomy being exercised at work on successful completion of studies was raised in the Discussion Paper to illustrate the non-sequential nature of the application of knowledge and skills. Increasingly employers expect VET and higher education graduates to be capable of exercising a high degree of autonomy, judgment and adaptiveness. An apprentice finishing a Certificate III qualification to become a tradesperson may routinely exercise a higher level of autonomy than a recent Bachelor Degree graduate in some fields.
- One option to address these non-linear dimensions could be to detach them from the AQF levels and map them across levels to better reflect practices for different occupations and workplaces.

In the NSW Government's view, the Review Panel should:

- IV. Review the description of the purpose of Diplomas at AQF Level 5 to reflect the differences in purposes and outcomes of diploma programs between the VET sector and the Higher Education sector. Higher Education Diplomas are often used as a pathway to degree programs or as articulation points for tertiary pathway programs, while VET Diplomas are recognised by industry and linked to a specific occupational outcome.**

***Review the description of dual sector qualifications at AQF Level 5***

- Diplomas at AQF Level 5 have different outcomes between the VET sector and Higher Education sector. VET Diplomas are recognised by industry and linked to a specific occupational outcome. Currently, Higher Education Diplomas are often used as a pathway to degree programs or as articulation points for tertiary pathway programs. In NSW, they also compete with the HSC as a pathway into higher education qualifications.
- AQF Level 5 is an example of where the dimensions of 'skills' and 'application of skills and knowledge' may be different for VET and Higher Education Diplomas.
- The different outcomes between sectors may not be readily understood by potential students, and potentially skew choice of courses towards Higher Education Diplomas.
- Higher education Diplomas should increase the level of discipline-specific knowledge to improve industry recognition of these qualifications and to broaden their value outside of use as pathways to Bachelor Degree-level tertiary study.

In the NSW Government's view, the Review Panel should:

- V. Review the qualification types at AQF Level 6 – Advanced Diploma and Associate Degree – to ensure the descriptors are clear enough to distinguish between the two. There is increased use of an Associate Degree as a qualification that blends Higher Education foundation content with extended area specific knowledge and this differs from the Advanced Diploma qualification.**

***Update qualification descriptors at AQF Level 6 to reflect current usage***

- Employers increasingly value sub-bachelor courses as entry-level qualifications in new and evolving career areas, often not requiring a degree at AQF Level 7. As both a standalone qualification and a pathway to further study, associate degrees have the potential to reduce costs, meet growing skills needs and improve parity across the tertiary sector.
- The qualification descriptors should be updated to reflect the evolving usage of Associate Degrees and clearly distinguish them from Advanced Diplomas.

In the NSW Government's view, the Review Panel should:

- VI. Retain the 'volume of learning' descriptor as guidance only. Use hours instead of years as the unit of measurement and indicate clearly that the amount of time needed varies across qualifications in different industries and between students with different backgrounds. Explore options to provide clearer guidance on the likely time spent in training for a new industry/discipline entrant to achieve competency.**

***Retain 'volume of learning' as guidance only***

- As the Discussion Paper notes, the volume of learning specified in the AQF does not reflect reality or indicate quality of outcomes of a number of VET qualifications – especially at Certificate I and II levels. These qualifications can often be delivered in shorter timeframes than the specified AQF volume of learning without affecting course quality, given the

generic and foundational nature of many of these qualifications. Also, the same AQF volume of learning applies to both Certificate I and II (six months to one year) and does not serve to distinguish these two levels.

- Despite its problematic nature, ‘volume of learning’ should be retained in the AQF to be used only as guidance.

### **Use ‘hours’ as unit of measurement**

- The proposed approach of using hours instead of years as the unit of measurement for volume of learning would be an improvement. This which would better reflect the increasing adoption of diverse modes of delivery (e.g. online, blended and self-paced delivery, as well as trimester-based and accelerated modes of delivery).

### **New Industry/discipline entrant is preferred over ‘new learners’ without tertiary experience**

- Defining ‘new learner’ is challenging. The Discussion Paper (p. 27) states that ‘new learners’ could be those who have no previous *tertiary* level experience. Specific reference to the absence of previous *tertiary* experience is too narrow to be applied to all AQF levels. Using ‘new industry/discipline entrant’ clarifies the concept that the learner is new to the content (knowledge) or context of application of skills. ‘Industry entrant’ is widely understood in the VET sector, and ‘discipline’ across the Higher Education sector.
- It should be noted that learners have different backgrounds, experiences and intellectual capability so the time required to achieve competency and completion would still vary between ‘new industry/discipline entrants’.
- The definition of ‘new learner’ should also outline assumed pre-requisite knowledge (such as literacy, numeracy, levels, etc.) in recognition that some new learners may require additional support.

### **In the NSW Government’s view, the Review Panel should:**

- VII. Revise the specification for the SSCE to better reflect the broad range of AQF levels that students may be exposed to, and that the SSCE can prepare students for further study at a number of different AQF levels. Also ensure representation/placement of SSCE in the AQF document does not give the impression that it is at the bottom of the hierarchy, i.e. lower than AQF Level 1.**
- VIII. Explore options for recognising the diverse outcomes, relative to the AQF levels, achieved by secondary school students in the individual courses undertaken as part of the SSCE. This could make it easier for employers, registered training organisations (RTOs), universities and other interested parties to understand and measure outcomes from a SSCE course relative to qualifications at other levels.**

### **Recognising the value of the SSCE**

- The approach proposed in the discussion paper: ‘Revise the SSCE descriptor to recognise that the knowledge and skills acquired in the SSCE can be at a broad range of AQF levels and result in multiple pathways’ is supported.
- In addition, representation of SSCE in the AQF document should be reconsidered. Tables within the current document have it placed before Certificate I with the hierarchy following. This contributes to the perception/misperception of its place/placement within the AQF.
- While there is general agreement that the SSCE should not be aligned to a specific AQF level, options may be explored as how to recognise the diverse outcomes achieved by

secondary school students in the individual courses undertaken as part of the SSCE, relative to AQF levels. The content and achievement benchmarks may be taken into consideration. For example, the difference between student outcomes demonstrated in a basic numeracy course compared to a high level extension mathematics course.

## Other areas of reform

**In the NSW Government's view, the Review Panel should:**

- IX. Provide a mechanism for how shorter-form credentials could be recognised within the AQF. This could be achieved either through grouping these credentials into a qualification type and/or acknowledging in the AQF Pathways Policy the importance of these credentials as building blocks towards full AQF qualifications. However, shorter form credentials should not detract from the value of full qualifications for individuals and employers.**

### *Provide a mechanism for how shorter-form credentials could be recognised within the AQF*

- It is important to recognise the value of shorter-form credentials and allow students recognition of the skills they have acquired. In the VET sectors, units of competency, skills sets and part qualifications (e.g. Statement of Attainment), while not being part of the AQF, are nationally accredited and effectively used to provide gap training and can be used as building blocks for full AQF qualifications.
- Higher Education units of study are already mapped to an AQF level but there is no recognition of them as a pathway or credential in and of themselves in the same way that VET competencies are.
- To recognise shorter-form credentials, consideration could be given to either:
  1. grouping these credentials into a qualification type; and/or
  2. acknowledging in the AQF Pathways Policy the importance of these credentials as a pathway subsequently leading to achieving full AQF qualifications.
- It is not recommended that shorter-form credentials be mapped against a specific or range of AQF levels as this would be confusing, increase the complexity of the AQF and potentially undermine the flexibility of these credentials.
- It should be noted that the use of shorter-form credentials to meet short-term more narrowly-focused skills needs should not detract from the value of full qualifications for employers and individuals. The AQF should clearly differentiate between the different purposes of shorter-form credentials (i.e. immediate, role specific) and full qualifications (i.e. longer-term, transferable).
- Possible changes to the AQF Pathways Policy could be to provide a high-level statement defining these shorter credentials, outline potential pathways, and principles of how to articulate unaccredited shorter-form courses into AQF qualifications, and describe what characteristics high quality shorter-form credentials should possess.

**In the NSW Government's view, the Review Panel should:**

- X. Provide guidance to education and training providers in the AQF Pathways Policy on how to facilitate alignment of unaccredited shorter-form credentials to the learning outcomes of AQF qualifications.**

### ***Expand the AQF Pathways Policy to include guidance on recognising shorter-form credentials***

- The AQF Pathways Policy could provide guidance on how to facilitate alignment of unaccredited shorter-form credentials to the learning outcomes of AQF qualifications, including clear documentation of the quality assurance process RTOs have adopted. This would assist education and training providers with assessment and granting of credit (such as through existing recognition of prior learning processes or capstone courses) to students who have completed unaccredited shorter-form courses. It would also help facilitate pathways from unaccredited training into recognised AQF qualifications.

**In the NSW Government's view, the Review Panel should:**

- XI. Strengthen the role of the AQF Pathways Policy as a national sector-wide policy that sets a clear objective of facilitating and promoting pathways between qualifications, across education sectors and into the labour market. The AQF Pathways Policy should not be revised or downgraded to become guidance only.**

### ***Strengthen the AQF Qualifications Pathways Policy***

- The AQF Pathways Policy should not be revised or downgraded to guidance only. Although the Higher Education Standards Framework and RTO Standards have a greater impact on provider practice, the AQF Pathways Policy has value as a national sector-wide policy that sets a clear objective of promoting pathways between different qualifications, and between education and the labour market.
- As a bridge between education sectors, the AQF Pathways Policy conveys status to pathways development work across institutions, particularly where such agreements are voluntary. This policy is a useful starting point for negotiations between RTOs and universities on credit transfer arrangements.
- As a part of this, the policy could incorporate shorter-form credentials (see section on shorter-form credentials above).

**In the NSW Government's view, the Review Panel should:**

- XII. Explore the benefits of a credit point system in providing a stronger framework for movement between education sectors, noting that the cost in the VET sector of translating units of competency is likely to be high.**

### ***Further investigate the benefits of a credit point system and its application in the AQF***

- There should be consideration of the benefits of a credit point system and whether it could provide a stronger framework for movement between education sectors with increased articulation.
- A consistent language and measurement used across the tertiary system may encourage the take-up of pathways between VET and Higher Education.
- The aim of a system of credit points would be to make it easier for students to systematically move from VET qualifications into a degree or other higher education qualification.
- A credit point system would be dependent on establishing a different relationship between universities and the VET sector.

**In the NSW Government's view, the Review Panel should:**

- XIII. Advise the Commonwealth Government to establish and maintain a national credit transfer register which provides articulation and pathways information including credit points awarded for the courses/modules. The Commonwealth is in the best position to take on this role as the custodian should be national focused, sector neutral, and have a clear mandate to promote pathways.**

***Develop a shared credit register***

- As highlighted in the Discussion Paper, TAFE NSW's credit transfer website provides a useful guide for students on credits available for completed TAFE NSW qualifications to articulate into a University or Higher Education provider degree.
- The TAFE NSW database currently holds over 3,000 credit transfer arrangements with other Higher Education providers. However, these arrangements can be time consuming and expensive to maintain and update. Students at smaller educational providers usually do not have access to the same level of credit transfer arrangements.
- To be successful, a national register would require substantial resources to establish and maintain currency in keeping up with changes to VET and Higher Education qualifications. The custodian would need to be nationally focused, sector (VET and Higher Education) neutral, and be given a clear mandate to promote pathways.
- The new website '[Course Seeker](#)', a Higher Education admissions information platform, is providing prospective students with transparent information about Australian Higher Education admissions. Consideration could be given to use this platform to host the shared credit transfer register.

**In the NSW Government's view, the Review Panel should:**

- XIV. Develop advice for the Commonwealth Government on governance arrangements needed to ensure that qualifications developed are correctly aligned with the AQF level assigned.**

***Strengthen governance arrangements for qualification developers***

- The variation that currently exists between qualifications in AQF levels within and across Training Packages and industry areas brings into question the application of AQF specifications during the development of Training Packages. While the AQF has an objective to enable 'comparability of qualifications', the current reality is that qualifications at the same AQF level lack consistency. For example one Certificate II course offered to secondary school students requires achievement of 7 units of competency (Active Volunteering) whilst another requires 16 units of competency (Warehousing Operations), and another 27 units of competency (Meat Retailing).
- Strengthening existing governance arrangements including moderation process could help ensure that qualifications are correctly aligned to an AQF level and reduce the range of disparities between qualifications at the same AQF level. This would provide greater clarity to both employers and individuals considering their study options.

## 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?

### Incorporating shorter-form credentials within the AQF

There are a number of challenges in incorporating shorter-form credentials within the AQF, including:

- **Confusion in the market place and risks to the quality and reputation of AQF qualifications.**
  - With a wider range of credentials becoming part of the AQF, the capacity of the regulators may be stretched in monitoring activity. Recent experience from Victoria demonstrates the negative consequences in the overall post-school system when qualifications have to be withdrawn (Victorian Government 2015<sup>6</sup>).
  - If recognition is optional and voluntary, employers and students may find it confusing as to whether the shorter-form credentials courses that they purchase are recognised. Such information would have to be clearly communicated to them by RTOs, universities and vendors.
- **In the scenario discussed above, there is potential administrative burden and increased costs to regulators and providers.**
- **Reducing the speed at which new shorter-form courses can be developed to meet emerging needs.**
  - Shorter-form, unaccredited credentials are often developed in response to specific and emerging industry need. Seeking recognition for unregulated shorter-form credentials within the AQF could delay their speed to market, negating a key advantage of this type of education and training.
- **Low demand to have these credentials accredited, on the contrary, would mean the benefit for students to build them into a full AQF qualification is limited.**
  - As the Discussion Paper notes, professional and vendor qualifications can fill a gap for enterprises and governments that wish to train staff in specific areas to meet their workforce skills needs. It is unlikely that vendors who successfully deliver unaccredited courses will seek recognition within the AQF, particularly given the potential registration and compliance costs with no clear benefits to the vendors, and possible intellectual property implications.

### Develop a shared credit register

As discussed above, a successful national register would require substantial resources to establish and maintain currency in keeping with changes to VET and Higher Education qualifications.

Support from education institutions and training providers is required so the various education sectors should be engaged early on. Participation can be optional while the benefits of a shared credit register to an education institution should be promoted.

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<sup>6</sup> Victoria Government, 2015, VET Funding Review.

Available: [https://www.education.vic.gov.au/Documents/about/department/VETIssuesPaper\\_July2015.pdf](https://www.education.vic.gov.au/Documents/about/department/VETIssuesPaper_July2015.pdf)

The Commonwealth Government is in the best position to take the leadership role, as the custodian of the register should be nationally focused, sector neutral, and have a clear mandate to promote pathways.

### **Communicating and promoting the AQF**

The Commonwealth Government should promote the AQF and how it should be used.

- Introducing changes to the AQF not only requires consultation on how it could be improved but also communicating to users how the change may have an impact on the system and different parties.
- Key messages could include:
  - relationship between the AQF and other Standards and policies;
  - any measures to ensure compliance with the AQF (e.g. better collaboration between regulators and RTOs);
  - availability of supporting tools and guidance for different AQF levels.