



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

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Respondent organisation (where relevant)

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

The AQF is useful in ensuring relative consistency of awards across Australia. It makes assumptions about consistency internationally.

The current framework reflects the timing of its genesis. Since then, Higher Education has grown in scale, diversity and complexity.

Hopefully, the results of this review will address the changes that have occurred in the Higher Education sector. Should an award acknowledge the mode of engagement - traditional face-to-face or completely on-line? Should an award recognize in some way that elements of the award were received via several different institutions, RPL, or other variations. The reflex answer might be that these differences do not matter but is this always the case?

The rapid pace of change in the workplace, in the technical, cross-cultural and interpersonal skills necessary, there may be questions about the relevance of broadly titled awards (e.g., Bachelor of Arts) versus narrowly titled awards (e.g., Bachelor of Event Management). The former may appear too general while the latter may be too narrow in scope.

Given the direction and speed of change, perhaps all 'higher' education awards should include mandatory consideration of life-long-learning as well as social and enterprise skills.

Perhaps the future AQF should include some discussion and guidelines on the relationship between the title of awards and the academic transcript.

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.

Page 13: “The AQF should recognise new skills and learning methods”

'Microcredentials' are raised in many places in the discussion paper. Apart from some limited effort to ensure relative consistency, it is not clear how additional bureaucracy and/or compliance burden along the lines of the current AQF will facilitate or add value to this area of educational development. Microcredentials have been with us for decades, primarily in the form of in-house education programs and short course awards from professional associations. The key question here is how to facilitate and invite innovation and, conversely, how to ensure that an already lively and creative arena of activity (one effectively serving many different markets through a wide variety of educational approaches), is not constrained by unhelpful administrative complexity or a drive toward standardisation.

Many corporations have their own training and short course operations – some in-house and some commissioned. There are many thousands of such courses – most would qualify as a form of microcredential. Few companies are likely to see value in taking their courses through an accreditation process to achieve formal recognition. However, it might be worthwhile to establish a set of key criteria to facilitate broader recognition of such courses without placing a narrowly restrictive regulatory framework around them. This may help individuals achieve recognition for RPL purposes (like statements of attainment in VET sector). Does an educational package related to a particular company or industry sector need to be recognised as part of the AQF if the industry concerned already accepts it as being suitable?

Many existing higher education providers have various ways of delivering and recognizing 'short courses' – some of these are clearly specified as recreational courses but others, with some conditions, are able to be recognised as contributing to an award. It would be worth exploring the nature of the recognition and the ways in which such existing arrangements contribute to the existing AQF structure. Perhaps more attention needs to be paid to RPL arrangements and their quality control.

Page 16: “Some shorter form credentials could be quality assured”. How long would any accreditation last? And what scale of submission would be required to achieve accreditation? And what additional staff resources would be required by TEQSA and by Providers in order to execute this process efficiently?

Page 17 (Refer to the second last paragraph about including the shorter form credentials in a matrix). This seems unnecessarily complicated and again begs the question of the scale of resources needed to establish and maintain such a matrix.

Page 19 “There is no settled way of teaching and assessing many enterprise and social skills”. There is ongoing debate about the best way of teaching and assessing what the discussion paper calls enterprise and social skills. At Macleay College, we specialise in teaching these skills as well as the industry and disciplinary knowledge related to each of our award

programs. Key elements of such teaching and learning are small class sizes and direct engagement with practical applications of the knowledge and skills. The approach is consistent across all courses and disciplines.

Page 20 “The application of enterprise and social skills is dependent on context”. This assertion is not supported by evidence. Such skills should not be context dependent. They are meant to far outlast the specialised and short half-life of many technical skills. They are meant to be transferrable – part of skills for life. And they are often specified as graduate attributes.

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.

Page 18 “Possible approaches”: Institutions should have the autonomy to determine where short courses fit in and how microcredentials may be ‘stacked up’ to eventually form an accredited award – subject to appropriate checks and balances. An important question here is the ways in which RPL and advanced standing are granted across courses and institutions and the application of QA to these processes.

Page 22 (Table 3): Level descriptors and qualification type descriptors should be more clearly specified. Removing the duplication between level and qualification type is not sufficient to address the ambiguities in both. Duplication is only part of the problem here.

Page 23 “Recognising the value of VET and higher education”: The notion of the VET sector being devalued is reinforced by Government instruments such as the 25% FEE-HELP loan fee.

A risk arising from the discussion of a hierarchy of value and prestige is that microcredentials are placed at the bottom of the ladder discussed here. Rather, microcredentials should be regarded as an alternative and equally legitimate means of achieving and accumulating the knowledge and skills required at each level of the ladder. It is an alternative ladder in its own right with its own advantages and challenges. Application of AQF thinking to this alternative ladder should only occur if it can be demonstrated to add significantly more value to the end-user than it costs to manage and maintain.

Perhaps it would be useful to ask what value microcredentials might lose or gain if they were not recognised under the AQF?

Other

Dual sector qualifications: In theory there should be no confusion about the standing and level of qualifications where the same qualification is offered across sectors. Nevertheless, there is evidence in the granting of advanced standing and RPL that there is a perceived difference between the level and quality of the same award from different providers.

Volume of learning: Macleay agrees that measuring volume of learning in years is problematic. Measuring in hours appears to be more useful. However, it is difficult to account for and assess the amount of self-managed learning. This is increasingly problematic with the growth of ‘blended’ and on-line components of awards.

Perhaps it is only necessary to specify an approximate range of hours of guided learning (e.g., face-to-face) and independent learning (self-managed hours) necessary for an 'average student' to succeed in completing the requirements of a subject/unit and, aggregated, an award. Given the variability of student capabilities, of instructional design and of teaching capabilities, efforts toward prescription will likely be counterproductive.