



# 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](mailto: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

Richard Finlayson

## Respondent organisation (where relevant)

Quality Training and Hospitality College

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

Although far from perfect, yes, I believe the AQF is mostly fit for purpose. Whilst there are major discrepancies between some qualification levels, e.g. Certificate III in Hospitality is far quicker and easier to achieve than a Certificate III in Commercial Cookery, they are both Level III qualifications. There are of course multiple examples of this throughout the vocations under the AQF. This is further complicated by the 'volume of learning guidelines', where qualifications at the same level are "supposed" to be delivered over similar minimum time periods. Whilst the current guidelines allow RTO's to 'justify' changes (reductions) to these timeframes, being open to interpretation is no easy fit for a very highly regulated industry

### 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 volume of learning is the biggest and most urgent priority. Consider the following key points. Firstly in almost every funding environment, it's impossible to deliver compliant training which follows volume of learning guidelines and comes close to being financially viable. As a result we recently took the decision to cease operations in Qld, rather than run programs that were either unprofitable or ran the risk of being deemed non compliant, yet RTO's still deliver these programs, under this funding umbrella. I would strongly recommend that the panel test one or two funding jurisdictions against the 'volume of learning guidelines' to see the scale of this issue. Many RTO's are now including very vague references on their website regarding the duration of training e.g. Up to 12 months etc, which does not accurately reflect their actual delivery timeframes, simply to get around the 'volume of learning guidelines. Equally many RTO's are completing the training but withholding the issuing of the qualification until the 'clock' has ticked over and they don't need to risk the 'volume of learning' issue. In short the current 'volume of learning' guidelines aren't fit for purpose and have a significant negative impact on both the learners journey and the RTO providing the training. I do however believe there needs to be a 'volume of learning' requirement, most good RTO's always had an 'in built' requirement generally termed minimum duration. The good news is, no-one needs to rebuild the wheel. The minimum durations that most RTO's used were based on the Victorian Purchasing Guide. Whilst in some quarters this guide has been dismissed as simply a 'purchasing guide', it is the most accurate guide to how long it takes an RTO to train and assess a unit. Obviously a large body of work has gone into determining unit by unit durations and as such, the minimum duration is not only different from vocation to vocation but can also be different within the same course, based on what elective units are selected. This system is simple, transparent, and makes sense. As per every RTO's Training and Assessment Strategy, minimum durations can still be altered but only via RPL, which reduces the current uncertain nature around 'volume of learning' requirements. Above all else, extending course timeframes often has a significant negative impact on the learners, especially in the lower level (Certificate II and III) qualification levels. These learners are often seeking to gain employment in a timely manner and extending qualification timeframes can have a very negative effect on their motivation to complete the program and gain employment

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.

Getting all states to agree with the 'nominal hours' concept may be challenging, especially when funding is linked to the completion of qualifications. However given you could 'drive a bus' through the current 'volume of learning' guidelines, I believe commonsense would prevail and we would use the unit by unit 'nominal hours' guidelines to determine the 'volume of learning' required, rather than some 'plucked' timeframes that have no bearing on the specific qualifications

Other