



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

Professor Dawn Freshwater, Vice-Chancellor

Respondent organisation (where relevant)

The University of Western Australia

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

Benchmarking of Qualifications

At the most fundamental level, the AQF continues to provide a fundamental and important service in benchmarking expectations across public and private education providers benchmarking level of education and volume of learning to particular qualifications. This is a vital role to prevent a 'race to the bottom'. However, in the current environment in which serious discussions around the future of higher education are revolving around issues such as micro-credentialling, work-integrated learning, etc., the framework as it currently stands may not be flexible enough to allow education providers to respond in an agile way to the future needs of students and employers. The AQF also has the potential to provide international benchmarking to demonstrate the equivalence of Australian qualifications to other international standards; this would be

an important initiative to support the internationalisation of the Australian student body.

Relationship with Professional Accreditation

The AQF provides a coherent scheme of learning outcomes, levels, and skills, which often map on to professional accreditation requirements, such as Engineers Australia. However, the broader regulatory environment for higher education providers in the sphere, in which the AQF sits alongside TEQSA/HESF requirements and the professional accrediting bodies themselves, is less coherent, leading to sometimes divergent pressures on education providers and duplication of effort and resources. Aligning the AQF with these other regulatory bodies and making more explicit the scope of each regulator would be an important step forward. The UA statement on professional accreditation lays out a possible way forward here.

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.

Our comments here are arranged around the specific proposals in the Discussion Paper

4.1 A wider range of credentials could be included in the AQF

We support this proposal, particularly around short courses, micro-credentials, and professional and vendor courses. Aligned to this is a key question of if and how these shorter qualifications can be 'stacked' and incorporated into a more substantive credential at a later stage, either as Advanced Standing or as an integral component of the assessed learning. The specific challenge here is whether or not this would create a framework that encouraged 'double dipping', in which multiple credentials were gained through the same learning experience. One possible way to deal with this would be to explicitly differentiate skills-based credentials that are, in effect, badges of attainment of a particular skill; and fully-credentialled qualifications that also speak to volume and level of learning. Hence, for instance, in the field of LOTE, it would be possible to develop a skills based ladder of credentials around language acquisition (such as the ILR) which could be awarded to any competent speaker (including native speaker), but the ability to include those skills-based credentials in a 'macro-credential' such as a degree would depend upon the contextual satisfaction of volume and level of learning criteria.

Ideally, any such shorter form skills-based credentials would be benchmarked against nationally- or even internationally-agreed criteria.

4.2 Enterprise and Social Skills

We support this proposal, and would support the development and deployment of national standards that would have to be demonstrably incorporated in the learning outcomes of all qualifications at and above degree level (and possibly below), irrespective of field of education. With increasing automation across the board, it is clear that the future of work will rely ever more on the social skills that cannot be so easily automated. Graduates need to be assured of these skills. By the same token, however, we also think it worth exploring whether there is a case for, and support for, institutionalisation of data and digital competency skills in all degree-level qualifications irrespective of field. Again, the basic logic here is that most fields of employment in the future are likely to involve some degree of engagement and interaction with digital systems, and a benchmark national standard for all graduates would both ensure that graduates attained these skills nationally and would ensure that employers could confidently employ graduates irrespective of field.

4.3 AQF Taxonomies and Levels

We support this proposal and note that it would also contribute towards resolving the tensions identified above between micro-credentials and 'macro-credentials' in so far as the skills-based orientation of micro-credentials would be exclusively linked to level descriptors, and the ability to articulate and stack those micro-credentials into a degree or other qualification would be dependent upon their context contribution to the qualification descriptors rather than the level descriptor.

4.4 Senior Secondary School Descriptors

No specific comments on this proposal

4.5 Volume of Learning

It is our view that volume of learning remains an intrinsic component of 'macro' qualifications such as degrees. Recognition and valuing skills through micro-credentialling can sit comfortably alongside this, along the lines outlined in the responses above. One of the critical distinguishing features of a degree-level qualification is precisely the volume of learning involved. This is an important international as well as national benchmark.

The unit of measurement for volume of learning, however, is more flexible. On balance, however, we support the continued use of years with, as noted in the Discussion Paper, the acknowledgement that individuals may attain any given volume of learning quicker or more slowly than the year-based norm. We support the continued use of years for two reasons. Firstly, it remains tied to a international benchmark rather than a national benchmark, particularly the Bologna Process, which is expressed in credits but with an explicit statement that 60 credits is equivalent to one year full time. Secondly, and relatedly, these are established norms within Australia, and there seems little point in changing them in ways that may create confusion. For instance, take the case of an

education provider that develops accelerated degrees that are offered in two years. To publicise this as a two-year degree would make it intuitively clear that the intensity of study required over those two years was equivalent to a normal three year program of study. In contrast, if Bologna-style credits were to be adopted as the currency, publicising a two year 180 credit degree is less intuitively clear what it means for the student.

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.

Other