



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 Erica Smith

Respondent organisation (where relevant)

Federation University Australia, but responding as an individual

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

In my view the AQF is fit for purpose and there is no need for any major change. In higher education, and to a lesser extent in VET, it has proved very useful.

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.

n/a

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.

I think implementation issues are important, but do not have time to tease these out from general comments below.

Other

I would like to comment briefly on a number of matters canvassed in the paper.

I would like to refer to the main users listed on p.10 and remind the panel that teachers/trainers and assessors are also important users of the AQF, having the very important responsibility of teaching and assessing at the correct level, and should be included.

On the issues of shorter form credentials, I feel that it is not the role of the AQF to encompass short courses. Qualifications are the bedrock of education systems. Many education and training opportunities exist outside formal qualifications, and always have done, but it isn't the business of governments to accommodate them nor of taxpayers to fund this. It would be an unnecessary diversion. Any arrangements that providers of 'micro-credentials' have with universities for credit arrangements should be between the relevant parties.

Enterprise and special skills. I do not think the term is a good one. The term 'Enterprise skills' really means something else to most people. I like the current generic skills in the AQF, and maybe a few extra skills could be added, but please do not replace the current list with a completely new one.

Revising the taxonomy. I think we should retain the level descriptors and the qualification descriptors. Both have a purpose.

I agree that some Cert IIIs may seem anomalous in their depth etc. But don't forget that an apprentice who has a Cert III qualification has three or four years of working experience and would be expected to be operating at a higher level as a result of that huge amount of workplace practice.

I think it appropriate for the AQF to be seen as a ladder – how could it be otherwise? I don't see it as being disrespectful to VET.

Regarding dual sector qualification types. I wonder if now is the time to remove postgraduate VET qualifications. So many people undertake these while not holding degrees, hence they cannot be delivered at the appropriate AQF level, and the qualifications cannot really be seen as equivalent to higher education postgraduate quals.

Volume of learning, This is a tricky area that in my view does need addressing. Dodgy providers can get away with poor practices in the absence of clear guidance.

I think the example of security quals isn't helpful. This is a notoriously poorly delivered qualification due to being a regulatory requirement (like aged care and TAE qualifications), and the minimum hours set by industry bodies should be seen as

representing only an attempt to get at least some rigour into the system.

Credit points. The number of points per subject already varies among universities, so it would be impossible to introduce this. And it couldn't be used for VET.

Pathways policy. Current university practices seem appropriate to me. I don't see the need for more accreditation for informal learning. Informal learning is great, but does not have to have a qualification outcomes.