



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

Sue Sizer

Respondent organisation (where relevant)

Energy Safe Victoria

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

Qualifications do not align with the AQF in many cases, particularly at trade level. The differences between many Certificate III level qualifications is extreme, which undermines the system, and does not recognise volume of learning or job outcomes. Reclassification of qualifications based on outcomes and levels of responsibilities may have numerous benefits, including being a small step towards addressing the social and cultural issues faced in the TAFE vs University debate.

There is widespread confusion in relation to some of the 'inbetween' levels of the AQF. While Certificates I-IV, diploma, bachelor, masters and doctorate are reasonably well understood, as soon as words such as 'associate' or 'graduate' are used it creates confusion. Consistency and clear guidelines are required.

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.

It will be necessary to carry out any realignment of existing qualification levels prior to commencing the allocation of AQF levels to any short courses, to ensure consistency.

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.

Volume of learning needs to be addressed and then properly regulated to ensure its application, but as well as, not in place of, quality. Having volume of learning operating alongside quality requirements for outcomes gives surety to regulators such as Energy Safe Victoria (ESV) in the issuing of a licence based on the qualifications. Definitions of the required volume of learning will require significant industry input, and may also impact on current regulations in many areas, so regulator input will also be vital to ensure existing regulatory requirements are met.

The recognition of skills sets & short term credentials would be welcome, on the condition it is regulated. There is little point in allocating AQF levels to short term credentials if it is not regulated in some way to assure quality.

ESV are the regulating body responsible for licensing of electrical workers in Victoria, and we are currently considering the introduction of continuous professional development (CPD) on licence renewal. Having AQF levels introduced for short term credentials will give us as a regulating body some assurance in the courses introduced for the purpose of CDP, as well as assisting us to ascertain the level of the courses we may consider accepting for this purpose.

While the recognition of skills sets for post trade learning would be welcomed by the industry, we are cautious of qualifications required for licensing being broken up, or incomplete qualifications being recognised. ESV does not support the recognition of incomplete qualifications that are not part of recognised skills sets, and a cautious of skills sets being artificially built up into qualifications.

It is also important to ensure that the recognition of the smaller skills sets or short credentials does not undermine the quality and recognition of the current qualification levels.

Other

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