

## Response to AQF Review

The Australian Qualifications Framework has been highly regarded internationally. Although it has not been updated since the minor alterations in 2013, my experience, particularly in Europe, is that there are still many aspects of the AQF that are highly valued. These include its emphasis on learning outcomes, the logical levels structure and the fact that the AQF itself has been incorporated into VET and higher education regulations and quality standards.

The AQF has been referred to in the current review as wordy, complex and cumbersome but we need to remember the context in which the AQF was reviewed and rewritten in 2011. Prior to the establishment of national regulators, Australia's education and training system was disparate, regulated and quality assured at state and territory level; qualifications were accredited by a range of agencies and increasingly there was a lack of consistency within each sector about what qualifications actually looked like and meant.

The taxonomic levels structure, descriptors of qualifications, including the notion of the volume of learning and policy structure, were attempts to address these issues.

It is now time to reconsider aspects of the AQF. But let's not lose the good aspects and sight of the reasons why some things were included in the AQF.

As Stephen Parker noted in 2018, 'While not a perfect instrument, the AQF is an important national policy which ensures that qualifications are defined consistently throughout Australia and that they are nationally recognised. It supports recognition of the value of Australian qualifications overseas and in doing so it helps protect the international reputation of Australia's tertiary sector.' (Parker, S 2018 *Reimagining tertiary education*. Melb, KPMG p21)

Stephen Parker's entire recommendation 2 is worth consideration by the Panel.

The IRU noted in a discussion paper on their website that the focus of any education and training systems should be the students, and 'the skills and knowledge they need, not providers. Providers are the tool.' Consideration of changes to the AQF should also adopt this philosophy.

### In response to the questions...

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

Overall the AQF is fit for purpose and just requires some updating and revision that any policy that has been in existence since 2011-13 would require.

**The approach suggested by the Panel is to transition to a single levels framework and then to align each qualification type and its descriptors against those levels – this would be simpler and remove duplication and potential inconsistencies. It is also more consistent with international practice.**

Agree this could be done. However there needs to be consistency in the qualification type descriptors. Duplication has occurred as the attempt previously to differentiate between the descriptors of qualification types and include additional information regarding knowledge, skills and application in the descriptor. It can be done as described in Table 3 page 22 of the discussion paper but there is a need to be cautious that if qualification type descriptors are no longer specified by the AQF, that inconsistencies do not arise and that there is confusion by developers and accrediting bodies about how each qualification can be described. If Table 3 is selected, there should be specific reference to the levels criteria.

While other countries may not include qualification type descriptors in their NQFs, they are generally included in other guidelines.

**Discussion Paper challenges the assumption that the application of skills and knowledge ascends in direct alignment with the level of skills and knowledge.**

The main challenges are the trades qualifications and there have been many arguments in the past for not accrediting these accurately. Certainly there is recognition that many current Certificate III levels Qualifications should be higher. A debate and argument to be had with industrial relations!

Agree with the approaches on page 23 and 24.

**Generic vs social and enterprise skills**

I'm not convinced that there is any argument for including a concept of social and enterprise skills and that the current description of AQF 'generic skills' is sector dependent. The definition of generic learning outcomes does not differentiate between the sectors but of course there are differences at each level given that each level is an expression of 'relative complexity and/or depth of achievement. (AQF definition). As an integral part of each level criteria, how could these be separated?

Agree with the approach that generic learning outcomes (we should talk about learning outcomes and not just skills) should be able to be taught in context of the qualifications content, acquired through teaching and learning strategies and assessed and reported fairly etc.

Do not agree that generic learning outcomes are expanded but certainly further research could be done in this area and there may be more up to date ways of labelling them.

**Senior Secondary Certificate of Education**

The discussion paper highlights the difficulties with the SSCE. Australia is not alone in grappling with where and how these qualifications should be placed in a qualifications framework.

Agree with the approach to relook at the descriptor and how it can be integrated into the AQF.

**Volume of learning**

The background to the VOL was an attempt to address the issues in both VET (generally the Certificate III and the TAE) and higher education (generally the Masters Degrees) of Qualifications that claimed to enable students to meet the learning outcomes in a much shortened periods of time. The 'weekend TAE' was a common example. The VOL was a compromise as neither VET or HE could agree with each other or within the sectors how many credits would equate to an appropriate description of the 'size' of a qualification.

Other NQFs have credit points systems, as does Europe with the higher education ECTS and VET ECVET systems, however they are based on measurement of the number of hours which is not effectively really any different to a measurement of years. Any new systems needs to be simple to administer, or at least no more difficult than the current volume of learning.

The preferred approach is to provide a common baseline for volume of learning, in terms of hours if that is agreed by developers and providers, but based on the expected time that a new learner would take to achieve he learning outcomes

- 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**

#### **Shorter form credentials**

There is an argument for considering the addition of shorter qualifications/credentials. However I agree that the focus of the AQF should be full Qualifications. We can learn from other countries, particularly New Zealand, in what are advantages and disadvantages is adding them to the AQF and how this might be done without compromising the integrity of the AQF and existing qualifications. Support the approach of using the existing criteria for adding qualification types to determine if they should be added. More investigation needs to be done.

#### **Pathways Policy**

There has been debate about the value and usability of the current policy, ably expressed in the Ithaca discussion paper. The Panel should note the findings of that research and revise the policy appropriately. It should not be changed to guidance as then it would be avoided even further. Agree a shared credit register would be useful and if the funds can be found to develop this, it would be useful for students to just go to one database to find out what credit etc they may be able to claim.

#### **Register Policy**

Agree this could be removed. It was redundant even before the AQF second edition was published in 2013 by which time ASQA and TEQSA had developed their databases.

#### **Issuance Policy**

There is value in retaining a policy that provides certainty about the integrity of AQF qualifications. There is also value in having a single approach to provide consistency in the overall features of a testamur, titles of qualifications, use of titles and statements of attainment. The policy could be amended to include micro-credentials if agreed to and also digital badging as this becomes more prevalent

#### **Alignment Policy**

Agree this could become a departmental policy and should be.

#### **AQF Explanations**

These were developed in response to consistent questions from AQF users. They should be updated and feel that including them on the AQF website is a logical place but they could also be included on regulators website.

If you have any questions regarding my comments, please contact me either by email at [dibooker@optusnet.com.au](mailto:dibooker@optusnet.com.au) or phone 0412 767 503

Regards

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Di Booker  
12 March 2019