



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

Salma Badr

Respondent organisation (where relevant)

Health Education and Training Institute (HETI), NSW Health Registered Training Organisation

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

Fit for purpose

The Australian Qualification Framework (AQF) has provided a single, nationally uniform framework which brings together higher education, VET and schools. The AQF is a flexible framework that has:

- Brought consistency and transparency to tertiary education and interactions between and across all sectors.
- Allowed qualifications linkages with each other in a range of qualification pathways between schools, VET and higher education.
- Facilitated pathways to and through formal qualifications.
- Assisted in defining the progression of education leading to further studies and higher level degrees.
- Helped in determining the language, literacy and numeracy requirements for entry to a qualification and has provided a useful foundation for industry consultations.
- Provided a basis for articulation pathways between the VET and higher education sectors.
- Enables qualification levels and descriptors with internationally benchmarked qualification

standards.

The AQF also provides integrated policy which outlines the requirements for:

- Specifications for the application of the AQF in the accreditation and development of qualifications
- Learning outcomes for each AQF level
- Issuing AQF qualifications
- Qualification linkages and student pathways
- Addition and/or removal of qualification types in the AQF

Not fit for purpose

- The structure of the AQF is not fluid and lacks the variety of micro-credentialling within and between qualifications.
- The structure of the AQF allows for a confusion between VET vs HE and duplication of regulations across both sectors.
- The variety of qualification titles used at the same levels for VET and HE creates confusion. Specifically the learning outcomes for a level 5, 6 and 8 qualifications, which must be exactly the same whether it is taught in the VET sector or HE sector.
- Ambiguity of the Volume of Learning, its interpretation by providers and application to each qualification and the disparities between qualifications. For example, the Volume of Learning which can be applied to the Diploma of Leadership and Management is much less than the one applied to the Diploma of Nursing which require much more time for students to learn the clinical skills required for the qualification.
- Ambiguity in terminology and inconsistencies in qualification level descriptors.

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.

In priority order:

- Have in place:
 - One national award system that encompasses all credentialing (including Micro-Credentialing); provides for lifelong learning and removal of the variety and duplication of qualifications delivered across both VET and HE.
 - One regulator governing VET and HE. Ensuring the regulatory instrument and policies provide clear outline of compliance requirements. This may consist of core standards aimed at common requirements such as the student journey, educator requirements and standards aimed at specific qualification types. e.g. research, course work, practical)

- **Volume of Learning**

The concept of the Volume of Learning is sound, however the definition of what it consists of is not clear and is often mis-interpreted by auditors and providers. The following should occur:

- Clearly articulate what the volume of learning hours consist of. For example, the total Volume of Learning hours = Amount of Training hours and Amount of Assessment hours. Each of these are then broken further such as Amount of Training hours = classroom based, workplace based, online delivery, webinars; Amount of Assessment hours = completion of tasks, workplace assessments, workplace observations, online assessments etc. Providers can allocate the number of hours to each component which then contribute to the total Volume of Learning for the qualification.
- A specific minimum number of hours must be set for each qualification (to ensure new

learners with no knowledge or experience are trained adequately). This must take into account the level and scope of the qualification. Providers must then, at audits, justify why their volume of learning is less than the recommended benchmark.

- The Volume of Learning hours must be allocated to each qualification (not the level). For example, the Volume of Learning for the Diploma of Nursing is much more than the total Volume of Learning for the Diploma of Leadership and Management. The Diploma of Nursing requires students to complete 26 Units of Competency vs the Diploma of Leadership and Management which requires the completion of 12 UOCs.

- **Qualification Descriptors**

Clarify descriptors, taking into consideration knowledge, skills and application requirements for each level, making a very clear distinction.

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.

- Having one set of regulations must be carefully planned to ensure consistent governance of the AQF as a whole. This can include using clear terminology, removal of inconsistencies in qualification descriptors and clearly articulating the requirements for the volume of learning.
- When removing the confusion and hierarchical nature between VET and HE, the vocational qualification outcomes and workplace education/training context and application must not be lost.
- The introduction of micro-credentialing must be flexible to allow the attainment of skills and knowledge for specific jobs. They may be multi-disciplinary and cross sector.

Other