



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 John Loxton

Respondent organisation (where relevant)

Chairs of Academic Boards Forum (feedback provided by the members of the Steering Committee).

The Chairs of Academic Boards Forum (CABF) is a forum for independent higher education providers offering opportunities for chairs of academic boards and board members to provide collective leadership and to influence developments in the Australian independent higher education sector. (See <https://cabfnuhep.wixsite.com/cabf>.)

Professor John Loxton is the current Convenor of the CABF. He was Deputy Vice-Chancellor (Academic) at Macquarie University from 1996 to 2006 and at Western Sydney University from 2007 to 2008. He is now a Senior Academic Adviser at Western Sydney University. He chairs the Academic Boards of two independent higher education providers, International College of Management Sydney and King's Own Institute.

This submission is made in a personal capacity and does not necessarily represent the views of any of these organisations.

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

The AQF was introduced to encourage “consistent recognition of qualifications and facilitate student mobility between education sectors”. It was framed as guidance. Following reviews in 2011 and 2013, the AQF is now based on descriptors for knowledge, skills and application of knowledge and skills “in increasing complexity over the ten levels of qualifications, complemented by volume of learning descriptors”.

The AQF is now embedded in regulation and no longer fit for purpose when interpreted as a legal instrument in different ways in the higher education and vocational sectors. The Discussion Paper admits that the objective of promoting a more coherent tertiary system has not been realised. The Discussion Paper also provides examples where “increasing complexity” may break down.

The Review Panel suggests that knowledge and skill requirements are shifting because of the changing nature of work, creating more demand for “enterprise and social skills” which are “for all young people and adults”. By implication, these essential parts of knowledge and skills are independent of any job role and any qualification. Moreover, “people want faster . . . on-demand learning”. The implication seems to be that the AQF should encompass a set of core skills and knowledge common to all qualifications but should also include new forms of “micro-credentials” alongside the traditional full qualifications.

If new qualifications are added to the AQF, then apparently they too must be embedded in regulation. Requiring formal quality assurance for short qualifications would surely work against access to faster on-demand learning. Any benefits of additional regulation in this area should be weighed carefully against the additional costs.

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.

The AQF could be reframed as two core sets of regulations separately for the higher education and vocational sectors. In the case of higher education, the core material would be aligned with the Threshold Standards. This core material could be complemented by non-regulatory guidance on topics such as course outcomes, delivery approaches and credit transfer.

Any changes should reduce the regulatory burden as well as ensuring that regulation is based on consistent, valid and reliable descriptors. Material now incorporated in the Higher Education Standards should be removed from the AQF.

Short-form credentials

“Short-form credentials” come in a variety of forms and delivery modes with the only apparent common feature being that they are short. The Discussion Paper is not at all clear about what features of these short qualifications could be located at an existing AQF level. Presumably, the outcomes of such qualifications could be identified as knowledge or competencies (skills) or particular applications of knowledge and skills, but it is hard to see how a short qualification could result in significant learning gain in broader discipline or professional knowledge or in enterprise and social skills. This suggests that the simplest and, perhaps, the only way to align short-term credentials in terms of “complexity”

alongside the existing qualifications would be based on their prerequisites or assumed knowledge.

This does not seem compatible with the AQF descriptors which attempt to assess the knowledge and skills that students gain from completing a qualification. The AQF attempts to give holistic descriptions of qualification types. A qualification is not homogenous. It should take students on a journey of development and transformation. The AQF could include guidance on characteristics of short-form credentials which are likely to contribute to a qualification at a certain level.

Just because a short-form credential is commonly used as a module in, say, a Bachelor degree does not mean that it is necessarily "level 7". A module on academic literacy or teamwork skills would hardly match the descriptors for a Bachelor degree.

The Discussion Paper suggests that short-form credentials that do not fit an existing AQF level could be assigned across several levels. This seems to admit that the AQF no longer functions as a linear hierarchy of levels organised on the basis of increasing complexity.

The Discussion Paper mentions the recognition of micro-credentials in New Zealand. For accreditation, micro-credentials must address a need supported by industry, employers or the community. Regulation of this sort seems unnecessary. If such a qualification has no support, why would it be proposed? Why would it survive? Should the value of a qualification depend only on its utility?

In summary, the AQF should focus on qualifications which result in broad learning outcomes and demonstrate some compatibility with the levels. Changes to the AQF should not expand the scope of regulation.

To support its purpose of promoting recognition of quality education and student mobility, the AQF could include guidance on the types of learning outcomes that characterise various qualifications and principles of credit transfer. This envisages a two-part AQF – a core written for regulation and associated material written as guidance.

The skills framework

The Discussion Paper makes the argument that enterprise and social skills are essential outcomes from all forms of education but should be related to the core content of the qualification. The AQF attempts to embed skills development in its hierarchy of increasing complexity alongside increasing complexity of knowledge. The Discussion Paper acknowledges the debate about how enterprise and social skills are acquired and that their application is dependent on context and seems to recognise that these skills must be taught and learned in the context of the core knowledge of the qualification.

This seems to support the view that enterprise and social skills (generic skills) are outcomes in varying measure from any period of disciplined study. They should be identified in graduate attributes and course learning outcomes. But the attempt to build a single detailed hierarchy of skills seems doomed because the same skills must be linked to qualifications at many levels. The AQF could play a useful role by providing guidance about teaching and reinforcing these skills in their various contexts.

Duplication in the descriptors of levels and qualifications

The core (regulatory) part of the AQF needs simplification and should be limited to a sensible hierarchy of levels and descriptors in the separate domains overseen by the regulators. It seems likely that the levels in the vocational sector should be mainly distinguished in terms of skills and competencies and the levels in higher education in terms of knowledge and scholarship. In this way, it might be possible to justify increasing complexity in each part. Descriptors that do not offer any discrimination across these levels could be abandoned, or included in the guidance on enterprise and social skills.

For higher education, there is a discontinuity between bachelor and masters degrees. Not all students move linearly from undergraduate to postgraduate study. The AQF does not adequately recognise alternate pathways to postgraduate study, nor does it fully recognise the graduate conversion programs common in some disciplines. Even at masters level, there are clearly different types of qualifications (masters by coursework, masters by research and certain so-called professional doctoral qualifications). For the coursework masters and also for Graduate Certificates and Graduate Diplomas, there is likely to be a difference in complexity between programs that require a cognate qualification for admission and those that do not. These distinctions are increasingly important as more students seek new qualifications as part of a career change.

The taxonomy

The Discussion Paper makes the point that the descriptors are unclear. In fact, they often seem tortured in order to achieve some sense of progression across the 10 levels in search of increasing complexity. The Discussion Paper gives one example, that of autonomy and responsibility, where the presumed progression seems unjustified. The autonomy of a tradesman in a role for which they have been trained may be greater than the autonomy of fresh bachelor graduate.

This example may be explained if the AQF descriptors, especially "application of knowledge and skills", are interpreted as transferable skills.

The basic taxonomy and progressive complexity probably make more sense across the major higher education qualifications (bachelor, master, doctor) and separately across the vocational qualifications. The Discussion Paper mentions that the bachelor honours and graduate diploma do not fit comfortably on one level. Some bachelor honours programs involve a large research project and have more in common with masters by research and serve equally as a pathway to the PhD, than they have with other qualifications at level 8 without a significant research project. However, this does not apply to all disciplines.

Given the almost unlimited array of short-form credentials, it is not clear what taxonomy could be used to categorise them.

Recognising the value of VET and higher education

The perceived bias against VET seems to be a cultural issue and the perceptions may come from students, parents, employers and careers advisers, as well as others. The AQF should provide clear standards and guidelines, but it hardly seems the appropriate vehicle for cultural change.

Nevertheless, the linear hierarchy numbered from 1 to 10 inevitably leads to a perception that level 10 has greater value than level 1. This dilemma could be addressed by separate

scales and core frameworks for the higher education and vocational sectors.

Each sector has its own value and should be recognised on its own terms. It seems misleading to think of a level 1 qualification as the first step along the path to a doctoral degree.

It is interesting to see how graduates rate their experience on the QILT scale of perceived overqualification and the significant proportion of graduates who feel overqualified. This may suggest that a multi-dimensional classification would have more value, rather than relying on a linear scale.

Volume of learning

The “volume of learning” is not a good idea. For a start it is a time, not a volume. The typical duration to complete the qualification in full-time years (1 year = 1200 hours) may be useful, but it is just that. It says nothing about “breadth” or “depth” which are undefined and not likely to be measured in units of time.

Whether the unit of measurement is year, week or hour makes little difference. As illustrated in the Discussion Paper, there will be a rule of thumb for converting from one to the other (1 year = 1200 hours). However, “year” is likely to create confusion between “calendar year” and “academic year” (traditionally measured in semesters with one year = two semesters) since the three-term year is gaining traction. The Discussion Paper notes the move away from traditional semester-based teaching which undermines the current “volumes”.

The apparent extra precision suggested by using hours is not significant because of the highly subjective reporting of self-study hours. “Hour” also has disadvantages for international comparisons because of the widespread use of “credit hour” in the US.

As the Discussion Paper admits, the time of learning includes timetabled classes and self-managed learning and is “difficult to assess”. Self-reporting by students suggests they spend much less time in self-managed activities than these sorts of guidelines envisage. The Discussion Paper seems to find comfort from the observation that most higher education qualifications comply with the prescribed time. But this may indicate that the “volume of learning” is a contrived outcome of regulation, or even that its prescription is unnecessary.

In summary, the “volume” should be abolished. If any guidance is retained, it should be defined as a duration (time) and measured in a sensible way that is valid and reliable and accords with common delivery patterns. The guidance should include suggestions on how to convert the measure from face-to-face delivery to online delivery and to other approaches in between.

Credit points

Credit point systems are common. Credit points are the basis of the European Credit Transfer and Accumulation System (ECTS) which has been used for some time to facilitate international mobility. Some such system seems useful as guidance.

While the Discussion Paper demurs, it seems clear that the misnamed “volume of learning” and credit points are not both needed. Since credit points can be used and justified for

subjects, it seems a preferable measure than the duration for qualifications. The use of credit points should largely remove the need to consider “new learners” since credit transfer would make provision for the shorter time required by experienced learners.

Policies

As envisaged in the Discussion Paper, policies which are included in the Threshold Standards and elsewhere should be removed from the AQF.

The Pathways Policy could be helpful as guidance. However, there have been previous attempts to develop a national register. This idea has been tried and failed.

The Qualifications Register Policy and the Qualifications Issuance Policy should be removed since they are covered by the Threshold Standards.

The references to alignment with international qualifications frameworks should be removed. An account of the different frameworks and their uses could be helpful as guidance.

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.

As long as the direction taken is to reduce regulation, difficulties of implementation should be much reduced.

This consideration seems especially important in connection with short-form credentials. The business of micro-credentialling opens up an array of complexities. In particular, regulation is likely to impose significant barriers to entry. Will an organisation offering a credential as a form of continuing education need to be registered, in addition to having its credentials accredited? Such regulation would create major benefits for self-accrediting institutions to the detriment of others. Is this a reasonable outcome? Short-form credentials need to respond rapidly to client preferences for just-in-time learning. This is not compatible with extended delays for review and accreditation. Any benefits of additional regulation in this area should be weighed carefully against the additional costs.

Where short-form credentials contribute to degrees and other full qualifications, the degree-awarding institution must determine recognition for prior learning within its policies and accredited qualifications. This has the advantage of accounting for the contextual nature of qualifications. The whole degree is more than the sum of its constituent modules and must account for the developing maturity of the learner progressing through the modules. Some form of guidance in the form of a framework for assessing recognition of prior learning would be helpful to learners seeking credit transfer, providers designing short-form credentials and institutions awarding credit for them.

Earlier reviews of the AQF sought to change practice. For example, the AQF sought to do away with 1-year masters degrees and masters degrees without significant research content. The descriptors seem to have since been weakened to accord with accepted practice.

The Discussion Paper draws attention to the differing regulatory requirements of vocational and higher education diplomas and graduate certificates, but shies away from sector based qualification types as "contradicting the need to ensure greater coherence and improve pathways across the tertiary education system". However, building a framework that ignores established practice seems futile. A better option could be a realistic core plus guidance on matters such as credit transfer between the sectors.

The Discussion Paper mentions that in New Zealand, each qualification type must have a minimum amount of content at a certain level. Presumably this means that subjects must be assigned to levels. This is not currently defined in the AQF. The Discussion Paper frowns on "graduate qualifications teaching primarily undergraduate units" without explaining what this means. The same knowledge can be taught at varying levels of sophistication and it is not clear that knowledge can be categorised as undergraduate or postgraduate. The same knowledge and skills can be applied at different levels in different contexts.

Other

In summary, the AQF has served a valuable purpose in promoting recognition of qualifications and facilitating student mobility. But if the AQF is to continue to serve this

purpose and cover new short-form qualifications as well as position core enterprise and social skills, then the nexus between the AQF and regulation must be broken.

To support its purpose of promoting recognition of quality education and student mobility, the AQF could include guidance on the types of learning outcomes that characterise various qualifications and principles of credit transfer. This envisages a two-part AQF – a core written for regulation and associated material written as guidance.