



National Tertiary Education Union

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Submission

to the

Australian Qualifications Framework (AQF) Review.

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Introduction

The National Tertiary Education Union (NTEU) represents the industrial and professional interests of some 28,000 staff working in higher education and research. We welcome the opportunity to make a submission to the Australian Qualifications Framework (AQF) Review.

The NTEU notes that the purpose of the AQF is to ascribe all senior secondary school, vocational education and training (VET) and higher education qualifications within a single, national framework. Through this function, the AQF also plays an important role in quality assurance, particularly within the tertiary sector, and indirectly, provides integrity for Australian qualifications and enables Australian institutions to compete effectively in the international student market. As a result of these primary functions, other countries are able to recognise Australian qualifications internationally.

The NTEU's believes that while the AQF should be regularly reviewed to ensure it continues to fulfil its purpose as outlined above, caution should be taken so that its role does not extend beyond these two important functions. This submission focuses on a number of key terms of reference of relevance to the tertiary education sector. Our argument, however, is underpinned by the need to ensure that the purpose of the AQF – as a national framework that allows for providers and regulators to ensure quality outcomes – remains the primary function of the AQF. In particular, the NTEU is concerned with the potential for the AQF to either directly or indirectly adversely impact the institutional autonomy of universities, particularly in relation to their authority to self-accredit their own courses and programs and on academic freedom.

We would also note that public policy is moving towards a more integrated education sector and that this change may have an impact on the different types and levels of qualifications. The increasing numbers of for-profit, private providers in the sector, often with narrow focus or specialty courses, also creates challenges for the AQF.

We understand that the premise of this review is to seek stakeholder feedback on how the AQF may 'evolve' to accommodate a more diverse education sector. While it is reasonable for there to be discussion on the role of the AQF in the changing sector, emphasis must remain on the AQF's primary purpose as a transparent, national framework.

Terms of reference

1. Review the AQF structure and components (levels, qualifications and relevant explanations) and associated guidelines to ensure that they:

i. position the AQF for the future as a flexible and responsive instrument that guides the provision of consistent high quality and transparency in the Australian education system;

ii. reflect the knowledge, skills and capabilities required by individuals for effective economic and social participation and which meet the current and anticipated skills needs of the Australian economy;

iii. effectively facilitate access to learning pathways and mobility (for example through articulation arrangements, credit transfer and recognition of prior learning) within and between education sectors, AQF levels and AQF qualifications;

The NTEU agrees that the AQF should provide clarity in terms of what qualifications education providers offer to learners and what these qualifications bring to the labour market more broadly. We do note, however, that it is up to education providers to determine the content of their qualifications (either as self-accrediting institutions, as universities are, or subject to approval from accrediting and regulatory bodies, if required). So while we support the idea that the AQF's purpose is to 'reflect the knowledge, skill and capabilities' imparted by a qualification (and thus provide transparency to prospective learners and employers and to assist with recognition of our qualifications internationally), we caution against any proposal that would see the AQF extended to the point where it in effect becomes, either directly or indirectly, a prescriptive regulatory framework to which providers must adhere.

Thus, while we would be open to discussions on how the AQF may assist institutions with developing more transparent and equitable arrangements regarding credit transfer, recognition of prior learning (RPL) and pathway or articulation arrangements, we are not supportive of the AQF going beyond that.

2. Review the desirability and feasibility of developing a system for the quality assurance and incorporation within the AQF of non-AQF credentials such as skill sets, enabling and foundation courses, micro-credentials and in-service and advanced training provided by industry or professions and other non-AQF credentials.

The NTEU understands that the premise for the proposal to extend the AQF to so called 'micro-credentials' (which includes skill sets, enabling and foundation course, in-service and industry training) is to allow for greater flexibility for learners and to create 'stackable credentials', whereby learners build on minor credentials towards a major award or credential.

While this seems like a reasonable concept, the NTEU believes there to be a number of as yet unresolved and problematic issues with this approach in practice, particularly with non-self-accrediting institutions (NSAIs). There are also questions as to the relative value of micro-credentials – if they are to be recognised for the purposes of credit for prior learning, or as 'stackable' qualifications towards a recognised qualification, then there may be an argument in favour of recognising micro credentials so that the appropriate weight may be given in credentialing. However, if the micro-qualifications are to be 'stand-alone' offerings, the Union has serious concerns as to their worth and their potential to be misused.

To be approved under the AQF, any micro credentials to be offered by the NSAIs would need to jump through all of the regulatory hoops to be accredited or approved by the relevant authority (in the case of vocational education and training (VET) the relevant authority is the Australian Skills Quality Agency (ASQA) and in the case of higher education the relevant authority is the Tertiary Education Quality and Standards Agency (TEQSA)) and that other regulatory frameworks are adjusted in the interests of maintaining the quality of such qualifications (e.g. Higher Education Standards Framework). We believe that it is important for this requirement to be maintained in order to ensure there is some quality assurance mechanism in subject and course offerings. It is worth noting that in general the NTEU is strongly opposed to lowering barriers to entry into either the VET or higher education market, especially given the recent market based experiment with such an approach in relation to VET-FEE-HELP.

In short, the NTEU has concerns regarding the quality assurance and risk of small, low skill, stand-alone micro-credentials (that do not build to a complete award or qualification) being recognised by the AQF. Not only do we have concerns about the pedagogy of such qualifications, but how the creation of a new sub-set of qualifications fits into and integrates with other formally recognised qualifications will need careful consideration by regulators, particularly for NSAIs.

The Union notes that it is unlikely that much thought has been given to the impact of what flow on effects a new set of classifications would have on other areas of the education sector and the workforce more broadly. Leaving aside the lessons that should be learnt from the Victorian VET scandal, which saw a proliferation of poorly designed and inferior courses and sub degrees sold to often vulnerable students, there are other risks that micro-credentials, if applied in a market orientated manner, may have. One such example is for international student visa holders who might be here to study an approved qualification, but are convinced while here to transfer to low skill micro-credentials. Currently, courses that are not recognised through the AQF are excluded from international student visa applications (although a student may undertake a micro-credential while enrolled in an AQF course), but opening the door to micro-credentials through AQF recognition would potentially see these also become part of the international student offerings, and thought must be given to how this would impact on the student visa system. The NTEU supports international education, but we are keenly aware that international students have, and continue to be, taken advantage of by unscrupulous providers. It is also a fact that human and labour traffickers use international student visas as a means to enable exploitation.

We also have concerns about how micro-credentials will change the nature of work in a sector that already has high levels of casualisation and insecure employment. Stand-alone micro-credentials are highly likely to be more attractive if they have the lowest overheads, of which staffing is the highest cost. We therefore advise caution on the recommendation that the AQF consider recognition of micro-credentials, noting that self-accrediting institutions can already offer and incorporate such credentials (albeit at a local level), so the greatest impact would be for the NSAs.

We also note that should these new subset of credentials be recognised by the AQF, appropriate additional resourcing must be given to the regulatory bodies to deal with the expected influx of applications and to assist their monitoring of providers. Additional resources may also need to be allocated to student ombudsman services to assist with student complaints, investigations and dispute resolution.

Recommendations:

- **The NTEU understands there may be a role for the AQF to assist institutions with developing more transparent and equitable arrangements regarding credit transfer, recognition of prior learning (RPL) and pathway or articulation arrangements. However, the NTEU is not supportive of the AQF taking on a role as a more prescriptive regulator.**
- **The NTEU has reservations regarding the recognition by the AQF of micro-credentials. If micro credentials are included as AQF qualifications, it is vitally important for the reputation of Australian education that other regulatory frameworks are adjusted in the interests of maintaining the quality of such qualifications (e.g. Higher Education Standards Framework). In short, this would mean that while universities would be required to apply the same rigorous process to micro-credentials as to other award courses, regulators would also be required to ensure the same applies to micro-credentials offered by NSAs. We acknowledge that such requirements would increase the cost to the latter significantly, but in doing so act we believe this would act as a deterrent to poor quality offerings.**
- **If micro-credentials are to be recognised by the AQF, it must be recognised by government and the sector that significantly more resources will need to be allocated to the relevant regulators so they are able to appropriately deal with the influx of applications for approval and to ensure providers are meeting regulatory obligations. Additional resources may also need to be allocated to student ombudsman services to assist with student complaints, investigations and dispute resolution.**
- **If micro-credentials are recognised by the AQF, consideration must be given to their broader impacts on other areas of the education sector, including international student market and visas.**