



# Submission to the Australian Qualifications Framework review

March 2019

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## Introduction

Queensland Catholic Education Commission (QCEC) welcomes the opportunity to provide a submission on the Australian Government's review of the Australian Qualification Framework (AQF) addressing the relevant Terms of Reference. QCEC endorses the government's recognition of the centrality of vocational education and training (VET) to Australia's growth in business and to support Australians for success in a changing labour market.

QCEC is the peak strategic body with state-wide responsibilities for Catholic schooling in Queensland. This submission is provided on behalf of the five Diocesan Catholic school authorities and 17 Religious Institutes and other incorporated bodies which, between them, operate a total of 306 Catholic schools that educate more than 149,000 students in Queensland.

QCEC affirms the position of AQF in the Terms of Reference as a flexible and responsive instrument that guides the provision of consistent high quality and transparency in the Australian education system and assists international recognition of Australian qualifications. Changes to the functions and subsequent structure of the AQF will have implications for Queensland Catholic schools.

The changing nature of employment requires that young people have transferrable and diverse skills and learning that is just-in-time and lifelong to successfully participate in a globalised, inter-connected and increasing automated workplace. It is timely to review how and what learning is recognised. *To adapt to the future of work, Australians will undertake a third more education and training and change what, when and how we learn.*<sup>1</sup>

Queensland schools offer a diverse range of opportunities to students to undertake a diverse range of VET qualifications, including school-based apprenticeships and traineeships, and university subjects while at schools.

Statistics from the National Centre for Vocational Education Research (NCVER) indicated there were 84,200 VET in schools students in Queensland in 2017, 34.8 percent of the total 242,100 VET in schools students in Australia.<sup>2</sup> In addition, in 2017 Queensland schools had over 50 percent of the Australian total school-based apprentices and trainees. We are pleased to note that nearly 50 percent of students who completed Year 12 at QCEC Catholic secondary schools in 2018 received at least one VET qualification.

## Executive Summary

There is significant research highlighting the changing world of work and therefore implications for how schools provide advice and pathways for young people to transition from school to work or further study.

Students in Queensland Catholic schools expect to have opportunities to obtain qualifications, undertake university subjects, and complete short courses as part of their school curriculum program. There are many options and opportunities for students in senior years at school and schools provide advice and structures to support students to transition from school to work or further study. Changes to the AQF will influence what schools offer and how they structure their timetables.

If the AQF is to be flexible and responsive in order to support pathways that reflect future work requirements, then QCEC supports in principle the change that gives recognition to Shorter Form Credentials in the AQF. However, QCEC would expect that inclusion of these credentials does not impose additional administration on schools.

There is an increasing demand for school students to develop enterprise and social skills as required by employers now and in the future. QCEC supports the expansion of the description list of skills in the AQF and guidance on how they can be delivered through various levels. However, QCEC suggests further consultation is required with education and industry stakeholders to determine the list of skills.

QCEC agrees that the level of autonomy and responsibility for some levels, such as an apprenticeship (level 3), is understated when compared to some other Certificate qualifications at the same level in the AQF and would welcome consideration of including a context definition in the qualification description.

QCEC does not support the alignment at an AQF level for the Senior Secondary School Certificate (SSCE). However, a description of the SSCEs that better recognises the knowledge and skills acquired for pathways to work and tertiary study is welcomed.

QCEC supports in principle, with some caution, consideration being given to change the volume of learning unit of measurement from years to hours based on the requirements for a 'new learner'.

QCEC provides the following responses addressing the five areas of possible change provided by the review panel and incorporated into the Terms of Reference.

### 1. Shorter Form Credentials

Reports and research into the future of work identify the importance of lifelong learning, rapid reskilling and non-technical skills for successful participation in a globalised, automated and flexible workplace. *Australia needs to change what, when and how learning takes place to master the growing unpredictability of work. There needs to be more flexible education and training opportunities and certification models to encourage lifelong learning.*<sup>1</sup>

The rapid rate of change in technology and its impact on jobs as well as globalisation and flexible working structures requires a *system that both cultivates lifelong learning and supports continuous upskilling and reskilling to be able to move across a working life. It is impractical to expect young people to stop working and go back to university or TAFE each time they change jobs or careers.*<sup>3</sup>

Shorter Form Credentials appear to be critical to the future and many countries such as Scotland, New Zealand and European countries already have provision in their national qualification frameworks for recognition of these.

QCEC considers inclusion of Shorter Form Credentials in our national qualifications framework to be necessary in terms of future work needs. QCEC supports in principle the inclusion of Shorter Form

Credentials aligned to AQF levels. School students who undertake Shorter Form Credentials such as Short courses (for example coding, safety courses), massive online open courses (MOOCs), enterprise skill sets, and other on the job learning could be given formal recognition towards a qualification to make them more relevant to industry and/or as credit for further study.

A key consideration for QCEC is that schools do not have additional administration or cost burdens imposed when utilising these credentials for students. Therefore, QCEC supports the suggested approach of adapting current criteria for qualifications to regulate what Shorter Form Credentials could be recognised in the AQF. This should provide an effective pathways framework for schools to identify credentials at levels and the possible pathway for credit to qualifications.

Inclusion of Shorter Form Credentials such as skill sets, short courses and micro credentials (such as work place learning) will have implications for the Recognition of Prior Learning (RPL) process currently in place in VET in Schools. Having these Shorter Form Credentials recognised and included in the AQF should reduce the need for RPL and save schools time and money to support students and teachers in the process.

## **2. Enterprise and Social Skills**

QCEC agrees that there is a consensus about the importance of enterprise and social skills, yet there are different views about what these should be. *Young people will need different skill sets to thrive in technology-rich, globalised, competitive job markets. There is a growing evidence base for the power of capabilities and employers are increasingly seeking them in young people.*<sup>4</sup>

QCEC suggests that social and enterprise skills can be acquired in the context of a subject area, as well as being developed independently depending on the skill. Students will develop many capabilities, such as problem solving and research, in different ways depending on the subject, course or VET qualification they are undertaking, but could also build some generic skills, in areas such as communication, collaboration and resilience without specific subject context.

QCEC endorses the development of a set of social and enterprise skills (including definitions) and reflected in the AQF that could be referenced by accredited authorities when developing qualifications. Maintenance of these skills would be needed to ensure currency and relevancy to reflect changes in work requirements. This would support the AQF being positioned as responsive to future work requirements and reflecting a framework for the 21<sup>st</sup> century. QCEC recommends that further consultation be undertaken with education and industry stakeholders to identify skills and develop an agreed definition.

## **3. The AQF Taxonomy and Levels**

QCEC supports the removal of duplication of descriptors between levels and qualifications in the AQF. Inclusion of knowledge, skills and application of knowledge and skills in both the level descriptor and qualification descriptor is unnecessary and can be confusing.

QCEC supports the suggested approach to include knowledge, skill and application of knowledge and skills descriptions in the AQF levels and then a description of each qualification type that is linked to each level. This should assist in providing clearer distinctions between levels of qualifications.

An important consideration for QCEC is the lack of distinction between the different knowledge and skill application demands of Certificates at the same level, such as trade and non-trade Certificate III qualifications. Many Trade Certificate III qualifications require skills, knowledge and responsibilities for decision making more closely aligned to Level 5, such as Electrotechnology apprenticeship. In order to enable some distinction between levels, QCEC would welcome the inclusion of a definition of the context for qualifications that are apprenticeship and traineeship based. This would assist in differentiating the trade and non-trade qualifications. The inclusion of Shorter Form Credentials could potentially enable aspects of trade and traineeships, such as skill sets, to be recognised at a higher level.

#### **4. Senior Secondary Certificate of Education (SSCE)**

The senior secondary certificate of education in Queensland is the Queensland Certificate of Education (QCE). Students who complete Year 12 receive a QCE issued from the Queensland Curriculum and Assessment Authority (QCAA) if they have accrued the required amount of learning, at the set standard, in a set pattern, while meeting literacy and numeracy requirements. In the required amount of learning a student must accrue 20 credits from learning options.

The QCE provides for a diverse and wide curriculum program for students, including subjects, short courses, VET qualifications and partial qualifications, school-based apprenticeships and traineeships, university subjects and recognised courses. Inclusion of Shorter Form Credentials in the AQF would have implications for the QCE offerings and therefore a school's curriculum program.

As mentioned previously, QCEC does not support alignment of the SSCE with an AQF level. For Queensland, the QCE enables students to undertake qualifications and part qualifications from different levels of the AQF.

QCEC welcomes the suggestion of placing greater emphasis on the role of the SSCE in providing the skills needed for work and pathways into tertiary education as an alternative to the ranking of students for tertiary entry. The content of this description would require further consultation.

#### **5. Volume of learning and credit points**

QCEC questions the appropriateness and relevance of the AQF using volume of learning, noted in years, for VET qualifications that are outcome focused and have competency-based assessment. This broad approach used for volume of learning is considered imprecise by ASQA and has led to some providers delivering qualifications, particularly at diploma level, in a very short and questionable time period. Connected to volume of learning is the Australian government's review into issues relating to unduly short training.<sup>5</sup> In recent years ASQA has sanctioned VET providers for delivery of VET qualifications in an 'unduly short time'. In cases of deregistration of a provider, students have been left without a qualification, without recognition of any competency gained and with considerable out-of-pocket expense.

QCEC appreciates that the current volume of learning in years is very general and has implications for regulation as noted above. However, QCEC cautions that any change to volume of learning should not encourage the focus for improving quality of VET outcomes being shifted to a regulatory focus on time at the expense of competency-based focus on learning outcomes. Volume of learning is the input and the emphasis for competency is about the learning outcomes. QCEC considers if hours are used for volume of learning they should be used on a nominal basis keeping the learning outcomes the key measure of competency for completion of a VET qualification. In addition, QCEC agrees with the use of 'new learner' as the benchmark for deciding on the nominal hours allocated as this will support recognition of other learning to be considered.

Therefore, QCEC supports the suggestion to change the volume of learning unit of measurement from years to hours provided hours specified are treated as nominal. The use of hours as nominal, enables students to achieve the qualification when deemed competent according to the learning outcomes even if it is in a shorter time than indicated. Students undertake subjects and courses in the curriculum program that provide them with opportunities to achieve learning outcomes in other areas of study, such as literacy, numeracy and digital requirements, that align with the qualification outcomes.

QCEC is also keen to explore further the suggestion of a credit point system that equates credit with hours, for example 1 credit = 10 hours (premised on the basis that the person is deemed competent) and would appreciate more details. A credit point/hours system would enable the recognition of Shorter Form Credentials towards qualifications at relevant levels. It could also enable recognition for

the complementary learning within the student's curriculum program to support achievement of other learning outcomes.

## Conclusion

QCEC welcomes the opportunity to respond to the Australian Government's review of the Australian Qualifications Framework. QCEC are pleased to discuss any of the responses further.

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