



# 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](mailto: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

Julie Hobbs

## Respondent organisation (where relevant)

FutureNow Creative and Leisure Industries Training Council

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

The Australian Vocational Education and Training Sector (VET) is a mature well developed system with strong infrastructure, process and instructor capability. The AQF is an integral part of this, providing clarity to the entire learning process and flagging where VET sits within this.

Assessment of the term 'fit for purpose' is dependent on the audience and purpose of this review. The AQF has been widely used and understood and has provided a valid way of accommodating the diversity of Australian education and training pathways and providing a nationally consistent framework. It underpins a wide range of Commonwealth and State policy and funding decisions as well as contributing to the fabric for industrial awards and professional recognition. This taxonomy of learning and skills that considers complexity and volume of learning content has been a very useful as a way of conceptualising the progression and application of skills and knowledge development.

However in terms of VET the AQF always been somewhat contradictory to a competence based system and its application is variable depending on industry context. As the discussion paper points out there are misrepresentations within the framework such as the anomalies around autonomy and responsibility that are

understated in some of the lower level VET qualifications. This particularly applies to Certificate 3 qualifications that form the basis of trade certificates which because of their work ready nature are producing graduates that may be more occupationally mature and sophisticated than higher level qualifications.

The discussion paper queries whether the AQF has failed to produce a coherent post secondary sector with strong linkages between VET and Higher Education. It could be argued that the de- investment in VET over recent decades and a series of policy failures linked to contestability have had more of an impact on reducing stability and collaboration in tertiary education and training than the AQF.

## **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.**

### **Model design**

The limitations of the AQF at this point may relate to the fact that it is by design, linear. This reinforces the historical hierarchical relationship between VET and Higher Education and does not reflect the reality of how people are moving between different education sectors to attain the skills they require or in fact the intrinsic value of the applied learning and research that resides in the VET sector. Alternative 'matrix' models as presented in the discussion paper provide a more representative and positive way to address this.

### **Short courses and microcredentialling**

The proliferation of non accredited short course 'just in time' and microcredentialling training solutions reflect the dynamic work and training landscape. There is an appetite by employers and learners to attain skills and knowledge in more flexible ways and in some cases to circumvent the barriers represented by the formal education and training sectors. It is also indicative of the slowness of training product development, the cost of full qualifications and the negative impact on quality that current over regulation of the sector is grappling with. The paper discusses the Productivity Commission's view that these learning typologies must fall under regulatory standards if they are to be incorporated into the AQF framework. In some respects this could undermine the dynamic and responsive nature of these emerging training products and once incorporated into the AQF, they may then be replaced by alternative products - again sitting outside it.

The most practical solution may be to continue to support short courses in the form of training package skill sets that are already designed to meet minimum requirements for inclusion in the AQF and allow microcredentials to sit outside the AQF in the social and enterprise training space. Another alternative is to revisit the Training product development process and the extent to which the compliance regime does stifle innovation.

**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.**

**Enterprise and social skills**

The discussion paper explores the critical issue of how enterprise and social skills can be incorporated into VET training product development work. The need for underpinning transferable skills is not new and sits within a continuum of employability skills that have always underpinned domains of learning. These enterprise and social skills that are now correctly identified as being essential to current and future worlds of work are more successfully integrated pedagogically if they are contextualised to the mastery of technical or vocational learning rather than being delivered in the abstract. This supports deep learning and suits the more direct learning style of adult learners. Current training product development work systems should be able to address this – either within the realms of specific training packages or potentially through cross sectoral projects. As with previous employability skills, these generic underpinning skills are able to be assessed and audited if correctly incorporated into learning programs.

**Other**

**AQF reference point system**

It seems like a logical and sensible approach to align VET to a credit point system, that is from years to hours as is the case for higher education. It accommodates the emerging range of learning typologies and contexts and should be set to the baseline of a new learner to provide consistency in model design.

**Pathways policy**

This submission supports;

- the revision of the Pathways policy as guidance noting that the primary responsibility for providing pathways sits with providers, training package developers and regulators,
- the development of a shared credit transfer register.

**AQF policies**

This submission supports;

- Removing the qualifications register policy from the AQF
- Retaining the AQF qualification type addition and removal policy in the AQF
- Removing the AQF qualifications issuance policy from the AQF

It does not support removing the Principles and processes for the alignment of the AQF with International qualifications Frameworks from the AQF.