



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

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

The fit-for-purpose elements of the AQF are:

1. It provides a mature, clearly understood and sound progressive structure well aligned to personal, technical and organisational needs.
2. Having just mapped the AQF to other types of systems/frameworks in multiple jurisdictions throughout the world for the purposes of setting up an international specialist industry practitioner certification scheme, I have found the AQF is acceptably designed and aligned to the equivalent schemes in other parts of the world including the EU, South Africa, NZ, the UAE, Ireland, Scotland and England (noting that Brazil, Japan, Canada (with the exception of a territory based framework in Ontario) and the US have no coherent schemes in place).

3. As a framework that (used to be) managed by an independent body, the independence of the AQF 'benchmark' from regulatory and political machinations was very useful (though it is noted that there is an historical academic/university protectionist anti-competitive bias in the original writing as discussed below).
4. The advisory nature of volume of learning expressed in years for a typical learner provides flexibility in achieving the required outcomes in a competency based training environment, but also recognises the time factor involved in truly developing knowledge and skill. ASQA's historical and on-going inability to adequately regulate the vocational sector is not going to be solved by giving them the opportunity to enforce an arbitrary number of years or hours, no matter what the baseline. Nor will the regulatory failures in enforcing adequate time to learn be solved by a trivial conversion of units from years to hours. More importantly, the push by regulators to create enforceable, rather than advisory, durations, is of significant concern, since, as is rightly pointed out in the source materials, we should be outcome focussed, not process focussed.

Prescriptive regulation of this is inappropriate, we have had students demonstrate competency in six months and others take six years – for the same nominal 12 month volume of learning course. How does one deal with RPL, is it the 2 days of evaluation, or the 20 years of experience of the applicant, noting that some ASQA auditors lack competency in interpretation of the application of RPL relative to assessment conditions defined in units of competency? How do we deal with intensive short course delivery verses a period of weekly class room learning over six months, or working with an organisation utilising 70:20:10 methodology verses someone studying in their own time without employer support, or other variations?

The not-fit-for-purpose elements of the AQF are:

1. The embedded anti-competitive content in breach of Part 3, 9 b. of the COAG agreed competition principles as articulated in the *IGA on Competition and Productivity-enhancing Reforms* (available on the COAG website): 'Regulatory frameworks and government policies binding the public or private sectors should not unnecessarily restrict competition'.

The anti-competitive operating environment preventing vocational providers competing with Higher Education providers has been achieved by the original authors of the AQF in multiple ways:

- a. By incorporating anti-competitive restrictions on which levels/qualifications can be accredited and/or developed under which accreditation standards, i.e. the Master's Degree states under the heading Responsibility for accreditation and development: 'Accrediting authorities and those developing qualifications for accreditation must adhere to the AQF specification for this qualification type and any government *accreditation standards for higher education* when accrediting a Master's Degree qualification'. Whereas in the Graduate Certificate and Graduate Diploma specifications it states: '*...any government accreditation standards for higher education or for vocational education and training ...*' The same restriction applies for Bachelor and Bachelor Honours Degrees and PhD's. While a public interest defence arguably exists for this at

the Bachelor and PhD (7 and 10) levels, this is inappropriate at Master level (the Scottish framework providing an interesting alternative addressing recognition of a non-academic pathway (level SVQ5) under its SVQ rating system (easily expanded and adapted to the 10 level AQF)).

This forces vocational education organisations wanting to expand their Graduate Certificate and Graduate Diploma programs to a Master's level to seek a double up TESQA registration alongside their ASQA registration, forces them to re-write and re-accredit their pre-existing accredited vocational Graduate Certificates and Graduate Diplomas in accordance with the higher education standards for them to be incorporated as units/modules in a Master and therefore creates an expensive barrier to entry (at least double, if not triple, the current development and ongoing cost for their accredited courses). Given the rigorous accreditation and oversight obligations they are already operating under, there is no defensible underpinning justification for this (Noting that most units or modules in a Master qualification are Level 8 and therefore we have supposedly equivalent units/modules at an individual level being denied equivalence when considered in aggregate). It is noted that a Master qualification by design can be completed by undertaking 'capstone' units that essentially involve the application of systems thinking approaches to integrating specialist topics – integration that is the bread and butter to senior subject matter experts and executives in industry but hardly the forte of many academics legitimately concentrating on highly specialised fields of study and research in a somewhat cloistered academic operating environment.

- b. This also means vocational and Higher Education providers are not competing on a level playing field in another fashion, as Higher Education providers can offer an articulated Master's with Graduate Certificate and Graduate Diploma exit points with the market position advantage of progression to a Master qualification, compared to a vocational provider who is prevented from offering this model. It is also noted that ASQA does not permit nesting of Graduate Certificate and Graduate Diploma accredited vocational courses – the ONLY ORGANISATION IN THE WORLD with this view (that they can't be nested), also forcing additional workload on vocational providers developing and delivering accredited Graduate Certificate and Graduate Diploma programs.
- c. Reference to 'research' in all Level 8 – Level 10 qualifications – this is the domain principally of academic or university Higher Education providers, vocational candidates are more likely to be involved in innovation and continuous improvement which could arguably be considered applied research, but requiring the ability to not only research, but also deliver better deliverable outcomes for industry in the vocational space – and therefore fulfil the meaning of a 'Master' as a 'master of practice' not the isolated/limited academic definition of the term.
- d. The ability to 'pair' or partner with a pre-existing higher education provider as a means of overcoming these constraints means the role and market positioning of the vocational service provider is subsumed in the qualification

being 'offered' by the Higher Education provider. Additionally, since the basic materials for the vocational Graduate Certificate and Graduate Diploma units/modules (arguably 2/3 of the qualification) are the IP of the vocational provider, and would need to be handed over to the Higher Education provider, the ability of the Higher Education provider to 'acquire' this IP and then dispense with the original author is unrestrained.

Alternatively, as we have found, while an individual academic is willing to work with a vocational provider, all four we have attempted to deal with have said this won't happen, because the 'academic board' of the relevant institution would torpedo the exercise on spurious quality grounds, usually, according to them, because of collective academic egotism/elitism.

2. The demise of the Vocational Graduate Certificate and Vocational Graduate Diploma qualification types has, on the one hand, enhanced the recognition of vocationally based qualifications at this level, but on the other, has created false equivalence and hence unjustified credibility to university Graduate Certificate and Graduate Diploma qualifications. The principal justification for this point is that vocational qualifications concentrate on both knowledge and skill, however, academic qualifications predominately focus on knowledge and 'research'.

Vocational organisations are now in the position of having to give equivalence to academic modules that on the surface meet our requirements in terms of stated 'outcomes', but when investigated, the student outputs/outcomes clearly do not demonstrate skill through competence in application. The ability of higher education providers to self-regulate also leads to many issues with quality that should be cause for major concern.

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:

1. All artificial barriers to competition should be removed from the AQF in accordance with COAG principles.
2. While the existing Master qualifications could (and likely should) continue to exist, a new Master of practice qualification should be created that focusses on all of (a) knowledge, (b) skill/competence and (c) innovation, capable of being delivered via a vocational pathway.
3. ASQA should be prevented from refusing nesting of Graduate Certificate and Graduate Diploma programs in the vocational space.
4. The AQF should provide an objective framework for the design and assessment of training and qualifications by any organisation. The AQF should not specify the regulatory framework under which such organisations must or should operate, i.e. separation of what and how. The AQF should not be designed to compensate for

underfunded or incompetent regulation of service providers (or their malpractice under such substandard regulation) but merely be a specification for recognition of skills and knowledge at different levels.

5. Vocational training providers should not be forced to arbitrarily provide equivalence to Higher Education providers who cannot demonstrate alignment of their training outcomes to both knowledge and skill performance elements that may not match the relevant unit of competency that the vocational provider is providing.
6. It is noted that it is only recently the regulations around development of Units of Competency were changed to remove level specifications, it is somewhat ironic that there is now a drive to amend the AQF to (arguably) compensate for this previous folly. Skill sets are a sub-set of a qualification, while useful to large organisations that have segmented tasks and activities, they are in many ways a short sighted artifice leading to a degradation of the ability of individuals to obtain a well-rounded and complete qualification and therefore be better placed for mobility within the workplace or promotion.

What would constitute a valid skill set at a particular level? Is it 1 UoC or module, 2, 3? Students already receive recognition via statements of attainment – the missing link is recognition of the 'level' that used to exist, no matter the number of units that were undertaken, or size of the course. To attempt to define any grouping would prove a logistical nightmare, It is suggested that all units of competency and/or modules merely be required to be defined at a level and let the industry decide how they are to be grouped tied to job functions.

7. A 10 level equivalent to the Scottish Vocational Qualification (SVQ) model should be adopted. Along with all units of competency and modules being proscribed a level.
8. Alternative training or prior learning could be managed through more understanding, effort and discipline being applied to the use and application of RPL – which would be (and in fact already is) the solution to integrating alternative learning pathways. Options that permit unregulated providers to claim alignment to levels with the lack of quality assurance and validation enforced on registered vocational training and Higher Education providers would lead to the whole system breaking down. The value of the investment made by registered organisations in becoming registered needs to be protected. At present, third party providers are free to compete as unregulated/registered providers (with certain protections on qualification types in place), or are at liberty to invest in becoming registered – it is their choice.
9. Taxonomies and levels (as articulated on page 3 of the *aqf review consultation presentation* document. There are fundamental differences in:
 - application of skills and knowledge at levels within the AQF as provided by different provider types, such as a vocational outcome for operating in industry versus an academic outcome focussed on academic and research achievements. This is appropriate, to suggest that 'purpose' should be the only transparent differentiator is unrealistic.
 - how knowledge and skills are assessed within the context of achieving

outcomes. Vocational providers are operating within a highly controlled externally assured and validated framework built around verifying explicit and measurable outputs (units of competency elements and performance criteria) supporting outcomes, whereas Higher Education providers are in many cases self-assuring against outcomes without underpinning externally validated and assured measurable outputs applicable to the wider skills need of industry.

- how service offerings by the different provider types are accredited, assured and validated within the two regulatory frameworks.

Such differences make the proposed approach a fundamentally deficient strategy.

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.

While some are articulated above:

1. There should be no contrived barriers to entry that breach the COAG competition principles or structurally embed anti-competitive behaviour and opportunities.
2. There is no practical impediment to permitting vocational accreditation and delivery of Level 9 qualifications.
3. Ensure the AQF meets its remit as a framework for learning and qualifications; leave the regulatory issues and obligations to the regulators with supporting regulatory frameworks and legislation; and industry certification with those bodies appropriately authorised and skilled to do so.
4. Credit points, while useful, need to be backed by substantive and defensible logic, assurance and validation.
5. Any attempt to lock in or codify volume of learning as a crude prescriptive regulatory tool should be avoided at all cost as it will just facilitate ongoing regulatory dysfunction focussed on process not achievement of outputs and outcomes.
6. Ensure that the competency based outcomes of vocational learning pathways are protected from academic depredations and illusions of equivalence in delivering competency based skills to industry.
7. Enterprise and Social skills – while there are some of these skills that could be generically applied across multiple levels and qualification types (and yes many can be assessed as an integrated part of qualifications), there are many that will not be fit for purpose or will vary in significance or need across qualifications, this should be dealt with with extreme caution, particularly at the higher levels.

Other

None