



# 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

Danielle Gallegos

## Respondent organisation (where relevant)

Council of Deans of Nutrition and Dietetics (Australia and New Zealand)

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

The CDND has welcomed the AQF as a transparent framework that has allowed the development of a range of qualifications that can be stand-alone or nested. It has informed consistent approaches to support the recognition of prior learning and credit transfer between institutions. The CDND agrees with the discussion paper regarding the changing context of education and for the field of nutrition and dietetics supports a framework that will enable:

- Career agility through the recognition of micro-credentials that could be offered by a range of providers
- Skilling and re-skilling for workplace agility
- International mobility (inbound and outbound)
- Integration of online, experiential and alternative teaching modes
- Ongoing support for competency-based education with a focus on graduate outcomes.

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.

### **Shorter form credentials**

CDND is supportive of incorporating micro-credentials that are accredited, fit-for-purpose and recognised, to address a specific need that is not already met in the tertiary education system and that is supported by industry, employers or the community. It is essential however that these credentials meet the seven criteria outlined on page 7 of the document.

For nutrition this is particularly vital with the expansion of nutrition “courses” to include a variety of offerings that are not based on scientific evidence resulting in people practising nutrition without being suitably qualified. This is of particular issue as dietitians and nutritionists are not regulated or registered under legislation. The potential inclusion of these programs into an AQF without adequate quality assurance places public safety at risk.

The CDND is supportive of approaches outlined on page 18. In addition to the points outlined the CDND recommends:

- Ensuring there is only one framework that covers all qualifications and credentials
- Extensive consultation of relevant stakeholders with adequate detail to determine assignment of credentials across AQF levels
- Enough detail in the AQF to be provide guidance regarding the criteria against which micro-credentials can be evaluated to enable the building of a qualification (that includes national and international offerings, as well as those offered online and in other modalities)
- Aggregation of shorter form credentials to align with:
  - o Professional requirements associated with advanced practice and resumption of practice
  - o Extended scope of practice
  - o Specialisation in a particular field – for example in dietetics this could be around developing paediatric, renal, intensive care, evaluation or public health specialisations
  - o Value-adding with respect to enterprise and social skills

### **Enterprise and social skills**

Enterprise and social skills are overtly integrated into the National Competency Standards for Dietitians <https://daa.asn.au/maintaining-professional-standards/ncs/> but not yet for nutrition scientists <http://nsa.asn.au/wp-content/uploads/2017/02/Competencies-in-Nutrition-Science-1.pdf>. Most of the outlined skills in the discussion paper are also incorporated as part of graduate capabilities for most university providers.

While enterprise and social skills can be context specific they are also generic capabilities that enable movement between disciplines and within a discipline area over time.

We agree these skills should not be presented as a taxonomy but rather clear guidance and recommendations on how they could be applied in different contexts at different points across the education system should be provided. In particular the assessment of these skills will require consideration and thought if such assessment is to be 'fair, valid and reliable'.

The CDND realises that the list of enterprise and social skills needs to be expanded but three particular attributes/skills that should be included are:

- Cultural competency or critical cultural consciousness
- Professionalism
- Systems thinking

### **AQF taxonomies and levels**

The CDND is supportive of removing duplication and redundancies within descriptors of each AQF level but to also provide a clearer description of the knowledge and skills required at each level. Currently in dietetics entry into the profession is via either an AQF Level 7 or AQF Level 8 undergraduate program or an AQF Level 9 post-graduate masters program. Some universities offer both levels concurrently – in clearly distinguishing the characteristics and the differences between each AQF level professional bodies who provide accreditation of programs based on competencies will be able to more clearly align with a relevant AQF level for entry level practice.

### **Volume of learning**

The CDND acknowledge the difficulties in establishing a standard for volume of learning and that both years and hours are problematic. This is made more complex when considering micro-credentials and their nesting to build towards a qualification. A credit point system based on a new learner would provide more consistency. However, this system would need to take into consideration:

- Clarifying a full-time load and improving consistency of "credits" across education and training providers
- Providing transparency regarding the hours underpinning the credit points
- Differentiating between credits provided by self-directed learning, experiential/practical training and work integrated learning (this will be essential when considering online learning). For example: science units that incorporate elements of knowledge acquisition and practical application (laboratories), currently credits are obtained for a unit and equivalency is assessed based on hours of laboratory as well as contact hours for knowledge acquisition.

### **AQF Policies – shared credit register**

The CDND sees the benefits of a shared credit register that would enhance certainty and transparency for students. However, as above, this would need to encompass all aspects of the learning experience at a level of learning that can be appropriately scaffolded within a degree program. Credit transfers from the VET and RTO sector would also need to align with professional standards. There needs to be recognition that for professions the professional accrediting body needs to be involved and that the learning is scaffolded to ensure safe and effective practice. While flexibility is the key, universities need autonomy to be able to decide the fit for purpose of previous learning based on the learning outcomes.

**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.**

Implementation of any approaches will need to be mindful of:

- Consultation with professional bodies to scaffold micro-credentials with professional credentialing and to ensure safety to practice
- Establishment of a credentialing authority to manage the quality assurance of micro-credentials with a set of clear guidelines that will govern volume of learning and the building of programs of study that would be recognised as suitable for entry into tertiary qualifications
- The challenges for universities and professional bodies in assessing the suitability of aggregated credentials for entry into postgraduate programs.
- Building capacity in assessing enterprise and social skills in a fair, transparent and equitable way. There is a dearth of evidence on how these skills can be assessed – if they are to be integrated then attention needs to be paid to ensuring a clearing house of appropriate tools. The CDND would welcome the return of an Office of Learning and Teaching to promote evidence-based pedagogy at the post-secondary school level.

**Other**

The Council of Deans Nutrition and Dietetics, Australia/New Zealand (CDND) was established in 2015 and is the leading representative body for university programs currently offering qualifications in Nutrition and Dietetics. It was established to provide strategic leadership in the areas of education, accreditation and research for nutrition and dietetics in a constantly evolving environment. The Council has two networks the Nutrition and Dietetics Education and Accreditation Network and the Nutrition and Dietetics Research Network.

Collectively, members are responsible for: a range of three year AQF Level 7 nutrition science degree programs; three four year AQF Level 7 dietetic professional qualifications; three four year AQF Level 8 dietetic professional qualifications and fifteen AQF Level 9 dietetic professional qualifications offered at the Masters level. The CDND therefore have a strong interest and stake in the development and review of the AQF.

**Contacts**

Professor Danielle Gallegos  
Queensland University of Technology

[danielle.gallegos@qut.edu.au](mailto:danielle.gallegos@qut.edu.au)

Professor Eleanor Beck  
University of Wollongong

[eleanor@uow.edu.au](mailto:eleanor@uow.edu.au)