



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

Dominic Riordan, Director Academic Quality and Standards

Respondent organisation (where relevant)

University of Wollongong

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

Fit for Purpose:

- Establishes a coherent and comprehensive qualifications framework for Australia.
- Underpins the enhancement of constructive alignment in the design and delivery of post-secondary qualifications, and thereby has become an important reference point for quality assurance of higher education.
- Brings greater coherence to the issue of recognition of prior learning through the Qualifications Pathways Policy.

Not Fit for Purpose:

- The AQF has had a negative impact on some qualification types – notably Bachelor Honours.

- Having descriptors for both Qualification Levels and Qualification Types is unwieldy.
- Volume of Learning is expressed in terms that do not fit the variety of circumstances in which post-secondary education is delivered.
- The taxonomy of Application of Knowledge and Skills has strong overlap with the other elements of the taxonomy (Knowledge and Skills).
- The status of the AQF as a part of the Higher Education Standards Framework is limited to learning outcomes and this leaves the status of other aspects of the AQF unclear. For example, since volume of learning is expressed at the qualification type descriptor level, it would seem it is no longer part of HESF requirements. Will this position change and if so, how?
- The AQF is silent on double degree qualifications. They are an important part of the higher education landscape and guidance would be welcome on how to build them in academically defensible ways.

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.

Refer to Section 3 below, where each of these points is addressed.

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.

Section 4.1 – Including a Wider Range of Credentials:

- Including shorter form credentials is supported in principle and subject to incremental approaches to implementation.
- The addition of one or more qualification types raises a range of further questions. What should it or they be called? Can it or they be named such that it will be fit for purpose at a range of AQF levels? Will this risk a loss of flexibility and additional administrative and policy workload within providers?
- The key to a cost/benefit equation is that the effort of credentialing is worth the inevitable cost of doing so. Fixed administrative costs are harder to defray over the life of shorter duration credentials.
- A mechanism whereby these shorter form credentials can be put together towards a more established credential is also critical.
- UOW has some experience of offering relatively low overhead professional development type offerings, which have gained recognition with particular professional bodies and therefore have a degree of transportability.

- Shorter and disaggregated credentials challenge two key elements of contemporary learning and teaching – scaffolding of content is challenging, and it becomes more difficult to meet the requirements of a credential including knowledge, skills and their application.
- The proposal for a qualification defined by its link to a qualification type is sensible provided there is a capacity to be more flexible around the hierarchy of qualification types. Hence, knowledge at lower levels in a short form credential may, when combined with higher order skills or their application, meet the needs for a higher order qualification type.
- To explain further, it is a potential drawback in a disaggregated environment that, for example, essential but non-technical knowledge is assigned to a lower AQF level when it is essential in order to scaffold learning to achieve more advanced learning outcomes. The paper confirms this issue on page 17. Being able to assign credentials across a number of levels would assist. But taken too far, this may make the assignation of levels meaningless.
- The most viable approach, the University believes, would be to approach this incrementally, and to begin by targetting an area where the University sees significant demand and thus significant opportunity – in the area of post-graduation professional or occupational skill or knowledge enhancement at Levels 8 and 9. This could perhaps be used as a suitable testing ground.

Section 4.2 – Enterprise and Social Skills

- The proposed enterprise and social skills would be valuable if included under defined content, particularly insofar as they are related to critical issues like work integrated learning.
- This would strengthen the actual and perceived quality of Australian qualifications.
- We suggest the review adopts the nomenclature of innovation and problem solving in preference to 'enterprise' skills. This better reflects the skills and places less emphasis on one of the contexts in which they might be used.
- Social skills are difficult to assure, and should take account of the diversity of the students in higher education. Social skills should be defined in a broad way to allow for students to demonstrate attainment via different means of communication.
- Providers face the challenge of determining how to design and assure these skills. This is particularly so if it is intended that employers are expected to see evidence of these skills on a student's record of results.
- The University agrees that students and employers would benefit if it was possible for providers to map these skills into curricula such that they could be part of a student's record of achievement. But the list on page 19 of the paper is large, and contains 4 categories and 15 skills. The capacity of providers to deliver and assure each of these skills (where appropriate) will require careful consideration. We suggest that any inclusion of enterprise and social skills be broadly framed to accommodate the diversity of courses and to allow particular areas of focus within those courses related to the area of study and graduate destinations

- In terms of the approach to these skills, it is reasonable to ask whether everything has to be assessed. Some skills must be achieved but others might better be said to concern students having opportunity.
- Insofar as there is discussion about assessment, the University's view is that this is better described not as being fair, valid and reliable. Assessment should be credible and trustworthy (as well as fair) not 'valid and reliable'. The act of assessing student learning in higher education is fundamentally an act of judgement based on samples of student learning.

Section 4.3 – AQF Taxonomies and Levels:

- The Higher Education Standards Framework weakened the status of the AQF as a whole as a mandatory reference in the design of qualification types. The HESF only references requirements around learning outcomes and only at the relevant qualification level. This has weakened the status of the qualification type descriptors in particular. This review is not a review of the HESF but qualification type descriptors are indicative and advisory since the new HESF took effect.
- The current structure of the AQF is challenging in competing in an internationally competitive market for students. This includes the level and volume of learning for Masters degrees and the status of qualifications at Level 8.
- The status of an honours qualification is challenging in a market where, on the one hand, UK providers and their partners offer honours qualifications for three years of full time study, and on the other, many other jurisdictions have no equivalent to honours.
- The alignment of honours to a 4 year bachelor degree course duration has arguably weakened the status of honours, given it is operating in two quite different contexts: firstly, professional degrees of 4 years duration; and secondly where it involves an additional, typically research oriented, year of study and as a pathway to higher degree research. The recognition due to students graduating from the latter form of degree is perhaps being compromised by the existence of the professional degree awarded with honours to all students who meet degree requirements.
- It may be time to rethink this area, and consider alternatives for 4 year Bachelor degrees. One option is a new Level 7 qualification, the Bachelor Extended qualification type.
- Another option is to look at having all bachelor degrees at the same level of the AQF (Level 7), merging all Level 8 qualifications with Level 7.
- The paper gives recognition that learning combined with experience gets graduates jobs, and this is a helpful point in understanding the context of the Graduate Certificate, the Graduate Diploma and the Masters degree. The concept of broadening qualifications is valuable. This concept helped to contextualise the purposes that post-graduation study can serve. The learning at Levels 8 and 9 is not, as the paper notes more broadly, truly hierarchical.

- The growing incidence of Bachelor of Research degrees is another matter that may require greater recognition within the Framework. Should this be considered as an alternative to the one year Honours degree? Should it alternatively be its own type of Bachelor degree?
- The University supports the revision of descriptors to reduce duplication.
- The University supports any reduction in the risk that qualification types would not conform to AQF level descriptors at the relevant level.

Section 4.5 – Volume of Learning:

- The status of volume of learning in the AQF has become less clear for higher education providers in that the Higher Education Standards Framework requires only that learning outcomes meet the requirements of the relevant level classification.
- The volume of learning requirements have put Australia at a competitive disadvantage in relation to some qualification types. However, changes to the volume of learning and greater realisation that the volume of learning is for assumed new learners has helped to lessen these impacts.
- Nevertheless, formal recognition that volume of learning is related to new learners is a good proposal.
- Credit points carry many different functions. There are some related to charging and liability and some related to other things like effort. So any broad change to their use would be challenging to a sector as complex and varied as the higher education sector. That said, a reference point on hours of student effort would be useful.
- The University supports the notion of focussing on the effort of the student not the effort of the teacher. It has a long standing indicative hours commitment that is based around this assumption (1 credit point equals 8-12 hours of scheduled and self-directed study – meaning a full time load would equate to between 850 – 1300 hours of study). A national reference standard would be useful and could be built based on the long-standing internal reference point used in this institution. This reference point is, we note, consistent with the advice in the Explanation document on Volume of Learning.
- Care should be taken to ensure that the switch away from years to hours does not compromise Australia's international education visa system, which is built around durations. There are potential impacts too on the way that student income benefits are administered.
- The explicit reference to the assumption that volume of learning is by reference to new learners would be welcome.
- It would be helpful to be able to demonstrate hours and a notional credit point value for shorter form credentials.
- Guidance in the AQF on the construction of double degrees at Levels 7, 8 and 9 would be welcome. The University has adopted an approach on how to manage the complementary nature of learning within these structures to arrive at a volume of

learning that is academically defensible. Other institutions have commenced offering even shorter duration double degrees.

- These degrees are very popular with students wanting to combine generalist degrees with a more professionally or occupationally oriented second degree.

Section 5.1 – AQF Policies

- The University has found these policies useful but their status is unclear and should be resolved. In particular, the Qualifications Pathways Policy has provided strong evidence to encourage staff to be flexible and to focus on learning outcomes in assessing credit.

AQF Credit Transfer Register:

- This initiative is cautiously supported with some significant provisos.
- It must include private providers and guaranteed credit by AQF Level.
- The Universities Admissions Centre is doing work at present to scope a centralised application system for credit.
- Such systems have been hard to realise in practice. This is because of the rapid rate of change. Qualifications are being updated rapidly, and at least every 5-7 years. Recognition of credit assessments can endure for very short periods of time, and the time and cost of maintaining many qualifications on these registers presents a poor return on investment.
- The University notes the potential of technology like Blockchain to assist in this regard, particularly if access to information is open and the requisite level of detail to allow records therein to be audited and verified if required.
- Moving away from generic learning outcomes would also assist by giving academic staff involved in credit assessment greater confidence that the learning outcome 'label' is matched by the unit of study 'content'.

Qualifications Issuance Policy

- This policy is of less value and most likely is best suited to be incorporated in relevant standards frameworks.
- That said, the issue of qualification naming is an area where students are at risk of being confused and misled. There are two possible responses to this that the University can propose:
 - Reinforce policy provisions that are consistent with the Australian Competition Law – qualification naming should be free of any risk that students as consumers will be misled or deceived.
 - Prohibit or otherwise regulate some particularly problematic and potentially confusing language appearing in qualification titles, such as:
 - Advanced
 - Extended

- International
- Global
- Integrated

The Qualifications Register Policy

- This policy has largely been superseded in the higher education sector by the provisions in the HESF.

Section 5.3 - AQF Explanations

- The University supports the notion of incorporating these explanations into the relevant elements of the AQF proper.

Other