



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

Karen Seary, Chairperson, NAEEA.

Respondent organisation (where relevant)

National Association of Enabling Educators of Australia Pty Ltd (NAEEA),
<http://enablingeducators.org/>

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

This paper is concerned with enabling education programs and their relationship with the AQF. Currently, enabling programs (alternatively referred to as access, widening participation, pathway, bridging or tertiary preparation programs) are not situated within the AQF, but are developed independently by universities to prepare students for entry into undergraduate programs. As a consequence, these programs cannot be used for credit in these undergraduate programs. The questions raised by the discussion paper include:

- Should such programs be inserted within the existing AQF structure;
- Should the AQF structure be amended to accommodate these programs; and
- Should such programs remain outside the AQF framework.

The absence of enabling programs from the AQF is a risk to quality assurance of these programs. While there is surprising consistency across many enabling programs (Relf, et al., 2017; Irwin, Baker, Baker & Carter, 2018; Baker & Irwin, 2015b; Baker & Irwin, 2015a; Hodges, et al., 2013).), and self-accrediting universities enforce rigorous quality assurance measures, overseen by TEQSA, for their own enabling programs, the lack of a framework for these programs leaves them vulnerable quality risks. Inclusion in the framework would also address concerns (Pitman, et al., 2016) about the transparency and portability of enabling program achievements.

However, the existing AQF cannot accommodate enabling programs adequately for several reasons:

Foundational and preparatory courses, such as Senior Schooling, are not adequately defined in the AQF. Given that many students articulate from either Year 12 or from enabling programs into undergraduate study, there should be a clear way of defining what foundational skills, knowledge and attributes are characteristic of these programs that mean students who successfully complete them are adequately prepared for undergraduate study. Without an adequate way of incorporating Senior Schooling into the AQF, it is difficult to position enabling programs within the existing AQF (this is not to argue that these programs are equivalent, but rather that they should be clearly defined to make comparisons possible).

Enabling programs are not vocationally based but serve the purpose of providing a pathway into other programs. As such, their express purpose is to prepare students for further learning. As students undertaking enabling programs generally intend to enrol in undergraduate study at level 6 or 7, it would seem that defining the nature of the skills, attributes and knowledge that indicate a student is adequately prepared for further study is critical. In the AQF framework, there is little distinction between levels 4 and 5 on this count, as detailed below:

1. AQF Level Summaries and Learning Outcome Criteria:

- The Summary statement differentiates the levels by allocating theoretical and practical knowledge and skills to level 4 and specialised knowledge and skills to level 5. While these definitions may adequately relate to skilled (level 4) and paraprofessional (level 5) vocational work, in terms of differentiating skills and knowledge relevant to further study, this is less clear. In fact, in many enabling programs, curriculums address theoretical, practical and specialised knowledge across different courses. If these levels are to include enabling programs, descriptors of foundational learning for further study needs to be more clearly differentiated.
- Similarly, in the Knowledge and Skills statements, within an enabling program, students will focus on developing broad, generic skills, for example in academic literacy and study skills, but will also develop specialist skills in discipline based courses with the aim of preparing for entry into a specific undergraduate program. While such skills and knowledge may be adequately defined in terms of vocational expectations, when they are applied to “further learning”, these terms become less clear. Thus, while it would be expected that enabling programs be described as level 4 or 5, defining these

against the current framework is problematic in that it does not adequately describe the requisite knowledge and skills for further study.

2. AQF Qualification Type Learning Outcomes Descriptors:

- The emphasis on competency based learning outcomes in this section of the framework contributes to a lack of distinction between levels 4 and 5 in terms of foundational learning for preparation for further study, and does not capture learning outcomes currently inherent in the enabling curriculum of many large providers. For example, Application of Knowledge and Skills references autonomy, self-responsibility and responsibility for others. This relates specifically to vocational outcomes, and in its current form has little relationship to preparation for further study. In the Skills section, while many of the skills described at level 5 are relevant to enabling programs, there is a wide range of 'soft skills' and pedagogical approaches which form a critical part of enabling programs (see Relf et al., 2017 as an example) that are not identified in these descriptors.
- Descriptors regarding the Volume of Learning are equally ill suited to enabling programs. The current range of 0.5 to 2 years for level 4 and 1 – 2 years for level 5 does not take into account the variety of enabling programs which have been devised to meet the needs of vastly different cohorts. Many enabling programs have as a standard the completion of a minimum of four courses over one semester of full time study (Baker & Irwin, 2015b; Hodges, et al., 2013). However, some programs, especially those that are open access and therefore cater to students entering with quite limited prior education, may require a longer period of study and the completion of more courses to ensure adequate preparedness for students articulating into undergraduate study. Other programs with more stringent entry requirements, such as the completion of Year 12 or literacy and numeracy assessments, cater for students who may already have high levels of skill and knowledge, but who require development around study skills, understanding university culture and processes, transition skills, and confidence. Measuring learning in terms of time spent is an inadequate way of determining the actual volume of learning required across these varying circumstances. In terms of enabling programs, it is universities themselves that are best placed to determine the learning required for successful transition by enabling students into undergraduate programs.

While programs within the AQF result in a formal qualification, the achievement of a qualification is of little consequence for enabling students. The emphasis for these students is on meeting entry requirements for undergraduate study, and academic and self-management skills that provide the preparation needed for successful transition into undergraduate study. This can vary enormously between individual students, and between the undergraduate programs they wish to undertake. Should enabling programs be incorporated into the revised AQF framework it would be reasonable of students to expect that they would receive, on completion, an award qualification. Such a qualification could conceivably match outcomes for currently described in level 4, level 5 or level 6, but not consistently so.

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.

For enabling education, the key priority is to have these programs situated within the national framework to establish quality assurance. However, this framework requires significant change to allow this to happen in a meaningful way that:

- ensures the quality of these programs,
- allows for diversity, particularly taking into account the relative disadvantage of students (Pitman, et al., 2016)
- allows for transparency and portability of qualifications,
- provides accurate and differentiated description of the skills, knowledge and attributes required for adequate preparation for further learning
- accounts for enabling programs approximating outcomes of the current levels 4, 5 and 6.

As the key purpose of enabling programs is preparation for further learning, rather than vocational outcomes, these programs would be best served by the inclusion of an enabling-specific category, level, framework or set of standards that sits alongside but outside of vocationally focused qualifications.

While enabling programs serve a similar purpose to Senior Schooling in preparing students for further study, this is the sole purpose of enabling programs while schools have a remit that goes much beyond this. Enabling programs also cater for far greater diversity. Enabling programs should therefore not be aligned to schools within a revised framework, but the framework should make accurate comparisons between Senior Schooling and enabling programs possible. Similarly, transparent articulation and pathway arrangements from both Senior Schooling and enabling programs, along with an accurate means of measuring equivalency should all be outcomes of a revised framework.

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.

Unless Senior Schooling is included clearly within the framework, situating enabling programs within the framework remains problematic.

The enabling education sector is developing rapidly as a discipline in its own right, and much work has been done in recent years towards benchmarking programs and defining standards and outcomes (Relf, et al., 2017; Irwin, Baker, Baker & Carter, 2018; Baker & Irwin, 2015b; Baker & Irwin, 2015a; Hodges, et al., 2013). This work is ongoing and is closely linked to the work of the NAEEA. Establishing a framework for enabling programs must take into account the many existing programs that are long standing and have been very successful in preparing large numbers of students for undergraduate study. The establishment of an enabling space within the AQF would require extensive consultation with existing providers and the NAEEA, the peak representative body for enabling education in Australia.

There must be consideration given to the diversity of enabling students, the range of undergraduate programs enabling students articulate into, the relative disadvantage of enabling students, their critical importance to the widening participation agenda, and a focus on the exit outcomes and capabilities rather than arbitrary and uniform curriculum requirements.

A significant period of transition, allowing universities to move through their self-accreditation processes within a realistic timeframe, will be necessary to ensure successful implementation of any national framework which includes enabling education.

Currently, an:

“Enabling course means a course of instruction provided to a person for the purpose of Enabling the person to undertake a course leading to a *higher education award, but does not include:

- (a) a course leading to a higher education award; or
- (b) any course that the Minister determines is not an Enabling course for the purposes of this Act.” (Department of the Attorney General, 2003, p. 384)”

Australian universities interpret and subsequently implement this definition in a variety of ways. This is considered important to meet the diverse needs of students in different areas and to tailor courses to different institutional contexts. In the current higher education environment, the essence of defining Enabling revolves around the function, form and funding of the program.

Inclusion of enabling education within the AQF framework would necessarily require a revision of this definition if enabling programs became award programs. It would also raise questions about credit arrangements. If these qualifications are clearly defined against other AQF qualifications, the stipulation that such programs cannot lead to credit would need careful reconsideration.

Other

A key reason for the inclusion of enabling programs in the AQF is to allow for portability of qualifications between higher education institutions. However, this may also be facilitated by Memorandums of Understanding (as currently exist between many institutions with regards to the recognition of enabling education qualifications) or by a sector accreditation process, developed by the sector. This may be more fit for purpose, given the unique nature of enabling programs, than inclusion in the AQF.

Finally, enabling programs remain a critical factor in the widening participation agenda of Australian universities. The continuation of ease of access to fully funded programs for all students who wish to take up the opportunity to develop the necessary skills and knowledge required for successful transition into undergraduate study is of paramount importance.

References

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