



# 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

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## Respondent organisation (where relevant)

University of South Australia

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

And

**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.**

**Role of the AQF**

UniSA accepts the aim of the AQF as:

- providing a definitional framework and taxonomy for regulated qualifications within the post secondary education system; and
- supporting the alignment and recognition of Australian qualifications internationally.

However, aspects of the aims and objectives of the AQF as described at:

<https://www.aqf.edu.au/what-is-the-aqf> go beyond that purpose and are out of step with the current regulatory and policy environment. Indeed, while the AQF is referenced in a range of legislative and equivalent instruments, in practice, there is some doubt whether the AQF is actually fulfilling any 'underpinning regulatory' role. The complexity of the taxonomy does not provide the objective definitions necessary for regulatory assessment and decision-making.

Similarly, the complex interplay of Levels and Pualification taxonomies compromises the tertiary pathway objectives of the AQF. Indeed, the current construct implies a hierarchical relationship across the qualifications, which in practice is not the case. The diagrammatic use of a wheel does not overcome the underlying hierarchical construct, and indeed implies relationships between qualifications, such as the SSCE in the centre as if it has a relationship across the AQF, that are misleading.

We also question whether the AQF, in its current form, plays any role in assisting "people to move easily and readily between different education and training sectors and between those sectors and the labour market". There is a tension within the AQF between describing/defining qualifications as outcomes of an education and training system versus attempting to locate qualifications within different levels of the labour market/job roles. Our view is that the AQF should be concerned with the former, that is, defining qualification outcomes only. Aligning qualifications to the labour market/job roles forms part of the role and purpose of a given qualification; some qualifications have very specific one to one relationship with an occupation (eg medicine, electrician and so on) while other qualifications enable the graduate to fill many different occupational outcomes. As the labour market changes, it is the responsibility of the educational provider to ensure their qualifications continue to meet those demands. A taxonomy cannot and indeed, should not, provide this level of definition. It cannot be that agile and still fulfil its broader policy purpose. Thus, as discussed further below, we would argue that the taxonomy and, in particular the "application of knowledge and skills" component of the taxonomy, requires significant review.

It is for similar reasons that we agree with the comments in the discussion paper that the AQF in its current form has not contributed to greater coherency across the tertiary education system. Indeed we would argue that it has had the opposite outcome. The complexity of the taxonomy, in particular the "application of knowledge and skills" component, confound and conflate real and useful distinctions between the role and purpose of VET and the role and purpose of higher education. We would argue that the AQF, while not reverting to the rigid sectoral definitions of the past, should provide a clear and distinct taxonomy of qualifications that highlight rather than obscure the differences between VET-based outcomes and higher education-based 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.**

**Recognition of shorter form credentials**

UniSA acknowledges the opportunities associated with the emergence of shorter form credentials such as skill sets and micro credentials in meeting the needs of the labour market for occupational specific upskilling. We would be concerned however, with a recognition system for shorter form credentials that undermines the intrinsic value of full qualifications for entry to or significant re-skilling within the labour market.

We are also concerned by the scope of possible short form credentials listed in the discussion paper. We would argue:

1. enabling and foundation courses serve a very different purpose and require a nationally recognized definition of what constitutes an 'enabling' or foundation program. This definition should include some statement of volume of learning alongside level of learning.
2. incomplete qualifications may not represent any particular outcomes and are already certified via academic records/statements of attainment and when they do represent a particular outcome can already be recognised through the issuing of a sub-qualification such as a diploma for an incomplete bachelor degree.
3. MOOCs, when assessed, are credentialed via that assessment, and when not assessed, do not represent a 'credential'.
4. Professional and vendor courses, by the nature of the industries that create and recognise such activities, the industry already provides a form of credentialing that has meaning for that industry.

Thus UniSA would therefore argue that from the perspective of the AQF the main areas to consider are skillsets (and the equivalent use of units of competency) and the provision of individual units or the packaging of units of study in higher education as a short course. We would argue that where such activities are provided by an already regulated provider (VET or HE) then *alignment* of outcomes with the AQF (e.g. outcomes of the short course align to level 7 of the AQF) is sufficient. Full *inclusion* within the AQF would suggest a separate QA/accreditation process, which has the risk of creating significant regulatory burden in what should be an agile industry-led activity and might be open to the sort of exploitation we have already seen through VET and VET-FEE HELP.

**Enterprise and social skills**

UniSA agrees with the argument that the only enterprise and social skills that can and might be included within a qualification framework are those that can be acquired/developed through a process of teaching and learning and which can be reliably and validly assessed and reported. We would further argue however, that beyond the generic skills expected of someone post secondary schooling, any further specificity of skill becomes the province of the specific qualification being attained and is not the role of the AQF.

As discussed above, a taxonomy by its very nature, cannot be adaptive to the nuance of an ever changing labour market, that is the role of the education provider (through for example graduate qualities) and the specific qualifications (course specific outcomes) it develops.

We would therefore recommend that the current generic skills (page 11 of the AQF handbook) might be updated but that no further action is required.

### **AQF Taxonomies and Levels**

UniSA agrees with many of the points made in the discussion paper regarding the complexity of the taxonomy within the AQF. This is partly a function of the basic architecture of the AQF, through the creation of 10-level framework into which 16 existing qualifications (including the SSCE) were retrofitted.

By constraining the AQF to 10 levels, the distribution of qualifications across the levels is also artificially constrained. The gap, in terms breadth, depth and outcomes between levels is inconsistent. For example, the gap in knowledge, skill and application of knowledge at level 1 and level 2 is significantly smaller than the equivalent gap in between level 7 and 8. Thus, the current distribution of qualifications across the levels, exemplified by the spread of lower qualifications across levels 1-5 and the bunching that occurs across Levels 6-9, does not appropriately reflect the differences in breadth, depth and outcomes of the qualification. This is further confounded by the complex and overlapping Levels and Qualification taxonomies, which mean that any given qualification can only be defined *relative to* the descriptors that both precedes and follows it.

If the primary purpose of the AQF is to provide a definition of Australian qualifications, UniSA would argue that the primary taxonomy should therefore be the definition of each qualification type, which then *aligns* the qualifications to a simplified Levels taxonomy for the purposes of international alignment, recognition and so on.

In so doing, the location of the SSCE certificate is also resolved. That is, it can be defined as a qualification in and of itself and its role as entry to a range of qualifications within the AQF can be better accommodated without the necessity of locating it within one level or through the current artifice of locating it in the middle of a circular diagram.

### **Application of knowledge and skills taxonomy**

UniSA agrees with the issues outlined in the discussion paper that the “application of knowledge and skills” descriptors are not fit for purpose. This particularly the case at Level 3, which represents many trade-based qualifications but is also problematic at Levels 7 and 8. We would argue that the shortcomings exist within both with the Qualifications and Levels taxonomies. Both require review and depending on the final revised architecture, should be included in one taxonomy only. Given the that they vary with the role and purpose of the qualification, our view is that “application of knowledge and skills” is better within qualification taxonomy and that the Levels are more broadly defined.

More generally, UniSA agrees that all descriptors require review.

### **Volume of Learning**

By its very definition – volume – requires a unit of measure. As we have seen for some qualification types, volume of learning with ‘years’ at the unit of measure has proven to be problematic, suggesting the need for a more differentiated unit of measure.

UniSA agrees with the arguments made in the discussion paper that volume of learning based on the notion of a ‘typical learner’ using hours as the unit of measure is an appropriate way forward. However, as we saw during the previous review of the AQF, arriving at a consistent unit of measure for a credit system proved challenging; in the university system 1 EFTSL at bachelor degree level equates to around 1,200 hours of student work. The hourly rate of training in Cert I is quite different to the hourly rate of training in an apprenticeship, is quite different to the hourly

rate of research and learning in a PhD.

So while UniSA agrees that volume of learning in the AQF is better defined where the unit measure is expressed in hours, we are uncertain whether this can be extrapolated out to one credit system across all types of qualifications. The ECTS, *European Credit Transfer System*, for example applies to higher education only.

### **Policies**

Given the AQF's current administration and governance within a Commonwealth government department, it is difficult to see how policies within the AQF can have currency without some form of regulatory or legislative force. We therefore agree that the policies be removed from the AQF and located either as guidance material managed by ASQA and TEQSA or regulated through the relevant standards framework.

UniSA does not support the development of a national credit transfer register. This is already covered under the information provisions of the Higher Education Standards Framework and is better managed at an institutional level given the many and varied credit and pathway arrangements now available across the tertiary education sector.