



# 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 names

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## Respondent organisation (where relevant)

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

In preparing this response, representatives from across VU, covering VET, HE (UG, PG, HDR), Foundations and sub-bachelors had several wide-ranging discussions, illustrative of the multiple dependencies and consequences of modifications to the AQF, and the complex nature of the AQF and its review. We started with a fundamental question, "What is the reason for the AQF and how close are we or not to its original intent?" We also presumed that the AQF may be being used less than is imagined by students, and professional bodies. We were also conscious that substantial changes to the AQF may have unintended consequences and impact on policy, for example, could students 'run out' of credit or training hours?

It was the view of VU that the AQF had utility and was seen as broadly useful in helping us to achieve some coherence in our dual-sector tertiary system, for example, enabling more specific and prescriptive pathways. Viewed from a different angle, it was felt that the AQF had rarely, if ever, prevented VU from developing units, course and pathways it felt were fit for purpose and pitched appropriately. Far greater issues were experienced when attempting to meet accreditation or regulator standards and expectations across two different regimes. If the AQF

were to be more fit for purpose it would have wider utility and usage or penetration into areas such as the awareness and acceptance by professional and industry accreditation bodies. Accredited skills sets are aligned to an AQF level and in general the AQF serves the TAFE sector well.

There has been much discussion at VU and across the sector regarding the utility of the AQF and its hierarchical taxonomy in rapidly changing and evolving education and future of work environments. The AQF is inherently sequential – is there a way in which, where appropriate access to ‘higher’ levels is not always from the level immediately preceding? In an assumed, ‘skills gap’ economy the extent to which the AQF either supports or inhibits flexible study options, learners curating and constructing their own qualifications from within or across sectors, or being recognised for in-service achievements needs examining. By extension, this leads to a discussion regarding the nature of grading as an assumed indicator of capability (especially in HE) and the academic transcript as an insufficient record of student competency. Being able to better ‘map’ capability against competency, knowledge against skills, in a non-hierarchical format could be of great benefit in constructing a new set of yet to be imagined learning outcomes and in affording some greater flexibility of choice for students that want to and are capable of constructing patterns of study and learning to suite perceived individual needs. Is it possible to move away from a numerical, scaled model and toward something that is more descriptive of ‘fields of expertise’ or domains of practice? VU welcomes any opportunity that would enable a qualification framework that enables more customisation by the student, whilst noting as yet unknown support or not for such outcomes from professional, statutory and regulatory bodies.

A more creative future aside, we were also concerned that a number of phenomena distort or now seek to influence the original intention of the AQF, such as the expectations of industry or other stakeholders in rapidly evolving work environments or disciplines. The University is satisfied with the AQF in general, but supportive of developing its standing in accordance with a contemporary set of standards associated with ‘21st Century skills’. The AQF does not use ‘21st Century’, contemporary descriptions of skills such as enterprise or social skills – one way to ensure recognition would be to include these terms, albeit at the risk of specifying skills that may need to change over the lifetime of the AQF, however, being silent on these means one might not be prompted to contemplate them. If not embedded in the AQF, then provided as a parallel document similar to the Australian Core Skills Framework or Australian Blueprint for Career Development could be a way forward.

A specific concern was the tension evident between different levels of the AQF, either of which were seen as entry to a profession. For example, in initial teacher training, levels 7 and 9 both lead to entry into the profession, although it could be argued that this is an issue for the professions where this is evident rather than the AQF. We believe leaving the entry AQF level to a profession or professional bodies creates some confusion. Further, the requirements for ‘entry level’ graduates do not demonstrate a consistent alignment with the AQF. Entry level graduates are not expected to have the experience required for more complex work to be undertaken in, for example, speech pathology, but they are expected to have the competencies required to manage a practice, supervise others, lead a team, be across a host of regulatory requirements, manage risk – and so on.

**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.**

The United Kingdom uses a series of qualification descriptors and other reference points in communication of the achievements and attributes represented by qualifications titles. This ‘qualification first’ and ‘level second’ approach has some merit, firstly describing the knowledge, understanding and abilities expected of someone with that qualification and secondly, describing

how qualifications relate to each other across levels. Supported by a range of quality code expectations, award programs and their constituent parts have consistency of titling conventions, nomenclature and alignment with, qualification descriptors, credit weighting, volume of study, generic outcomes and benchmark statements (similar but more extensive than the Threshold Learning Outcomes that had a fleeting impact under the ALTC). Benchmark statements are seen as particularly useful in program design and the specification of program learning outcomes, exemplifying what outcomes of knowledge, understanding and skills look like for a threshold qualification in a specific subject and discipline areas. Whilst perhaps not a central concern of the AQF review, this also points to a philosophical difference between the UK and Australian approach to, in particular, the design and validation of higher education qualifications, with the UK typically taking a whole of program and 'top down' approach compared to an often 'bottom up' approach seen in Australia and other jurisdictions with unitised course architecture. Similarly, it was perceived that the NZQF was superior as a framework for the design of qualifications and how learning is taken form one level to another. It may also be argued that the UK Quality Code and supporting documents (and those in other jurisdictions) are easier to interpret and understand than the AQF – particularly by audiences and stakeholders outside the tertiary education system. VU thought there was some merit in a revised AQF having less specification and linear hierarchy and in the document being more accessible (in content and in reach) to those outside the tertiary system.

Volume of learning was seen as a necessary but problematic expectation in that the system has been variously abused over time. There is an inherent tension between an outcomes-based approach to demonstrating achievement versus the length of time in a course expected to achieve those learning outcomes. Nevertheless, it was accepted that volume of learning in some form is required to indicate the approximate time it might reasonably expect take a 'new learner' to achieve the outcomes and to help distinguish between types of qualification at the same level. At a very specific level there is a disjoint across jurisdictions that may impact international students, where for example, a qualification achieved over one timeframe in Australia is not, because of differential volume of learning expectations, not recognised in the student's home country. Elsewhere, the AQF is remarkably silent on literacy and English language qualifications. In VET, the volume of learning specified in the AQF at a Level 3 states typically 1 -2 years and up to 4 years which was based on apprenticeships and traineeships all at this level. There are Certificate III courses (non-apprenticeships or traineeships) that have much shorter duration than 1 year, often 6-9 months due to the Training Package requirements and the Purchasing Guide nominal hours. ASQA requires the courses to map to the AQF volume of learning and are often inflexible in this direction.

Again, while not central to the AQF review, it is noted here that there is little harmonisation or alignment of credit points in the Australian sector, whilst at the same time, bodies such as UAC a seeking a credit management system to overcome inefficient credit approaches, opaque and disjointed form admissions processes and Higher Education Services are promoting MyeQuals as a platform to record student achievement and credentials. The Credit Accumulation and Transfer Scheme (CATS) and European Credit Accumulation and Transfer Scheme (ECTS) have sought describe and monitor credit bearing and harmonise credit points with notional hours of study, leading to a general understanding that under CATS for example, a unit of HE study is 10 credit points, equating to 100 hours of notional study (without prescribing a ratio of 'contact time' to independent study). Named qualifications are then ascribed overall credit points required to gain the qualification with a minimum proportion of those credit points required at a particular level. Credit can be awarded for study within the awarding institution or for recognition of prior learning elsewhere, be that in a formal education setting or not. CATS, along with the UK Quality Code (or similar approaches in other jurisdictions) has led to a consistent approach in the UK, Europe and elsewhere for understanding the distinguishing features of qualifications (knowledge, understanding, skills, abilities), the expected time it takes to achieve those outcomes, and for promoting lifelong learning and student mobility. The AQF encourages the recognition of non-credentialed learning but provides no assistance is how that might be recognised in the non-VET

space.

**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.**

A variety of implications were identified which were more or less related to the AQF, in that some issues were more to do with regulation and funding arrangements than they were a framework for qualification issue alone. A more flexible and responsive to modern demands approach to student choice and mobility requires changes to funding and regulation. Where coherence has not been realised is surely directed more at regulation and funding rather than the AQF itself. That said, some stand out issues arose as discussed below.

- Intersections between accreditation/registration bodies and the AQF. One of the most significant issues raised during our internal discussions was the alignment or not of professional standards with the AQF. Is there scope, for example, for accrediting bodies to work with/under the AQF umbrella so that standards at industry level are informed by AQF standards? The penetration of the AQF into the accrediting bodies – who have their own interests and needs in advancing the causes of particular professions, which includes restricting the professional pool of graduates – is a burning question. The reach of the AQF into the accrediting bodies in a meaningful way remains an issue and we doubt that the AQF has had the reach that was expected and remains desirable.
- Similarly, employers may not appreciate the relevance of the AQF relative to skills required for particular jobs. Currently some employers believe the higher the AQF level in the same discipline the better, whereas the skill and knowledge set may be more appropriate at a lower level for particular job roles.
- The ways in which VCAL is being used is not the way it was originally intended – some schools are using VCAL as a means of streaming students out of study.
- Globalisation brings a new challenge of moving from less regulated learning environments to more regulatory environments. What might be developed to recognise this within the revised AQF?
- When is a micro-credential or a skill set merely an incomplete award, rather than something to be added into the AQF?
- Do we require input from regulatory and accrediting bodies in relation to the role these institutions perceive for the AQF in regards to VU programs?
- It has often been noted that VCE/Senior Secondary does not have its own level, however it is recognised that there is a wide variation in the potential level of VE relative to the subject or discipline.
- There are unintended consequences for performance counselling students in non-award courses such as ELICOS and foundations – students cannot move to lower AQF levels without applying for another visa. There are similar issues with concurrent study opportunities.
- There is only one terminal qualification in the HDR area, with funding attached to completion, making incomplete awards problematic. That said, might it be possible to ‘bundle’ elements of the coursework into a micro-credential?
- Substance and integrity of the micro-credential – do we need a position on the status of the micro-credential relative to it being from within or outside a credentialed course of study?

## Other

We tend agree with the changing nature of work sentiments in the scoping paper, however the rapidity of that change brings into question the longevity of any revision to the AQF and its ability to account for future changes. Perhaps the review period should be fixed to every 5 years. Allows for relevance and consistency in the graduate skill set connected to an AQF level.

How do we manage for the provision of micro-credentials or CPD (Compulsory Professional Development) for people who have completed qualifications and need to refresh/enhance their skills as part of their currency of practice in terms of AQF (this is somewhat referred to on page 17) but for the most part micro-credentialing appears to be discussed in terms of undergrad or initial qualifications? Could the expectation be that micro-credentials are pitched at postgraduate level, even if the content is refresher that is bringing practitioners up to current levels of knowledge of an undergrad student? How does the framework help us with that?

Micro-credentialing and short form courses received much discussion and we were keen to avoid the conflation of micro-credentialing with industry badging, notwithstanding the view that micro-credentialing as an industry recognised digital badge would for many be a most favourable outcome. Of course, not all micro-credentials would result in a digital badge and vice versa. There was a view that micro-credentials had the potential to add value to base level credentials. Does micro-credentialing provide a way in which the various levels within and overall credentialed level be recognised (noting the NZQA statement on the dangers of reducing courses to a 'stack' of micro-credentials). We note with interest the developments in micro-masters and stackable credentials at Curtin. It is also acknowledged that these are currently geared toward accessing further levels of study and do offer an intriguing insight into what a more customisable offer might look like.

Apprenticeships and internships are a mode of delivery, rather than levels. Is there a legacy of time served and custom and practice impacting on duration of these, similarly there is a wider variety of age groups entering apprenticeships that do not reflect the traditional school leaver pathway? There is a view that the alignment of trades at AQF III is too low a level; the AQF itself does not prescribe a level to individual qualifications and the current level is a function of history and industrial relations/practice. From a design point of view the trades or apprenticeship could be at any level and if we took a broad view of the apprenticeship model as a way of learning we could have apprenticeships or cadetships etc. at a number of levels including degrees, even post graduate. Going further there is nothing in the AQF to preclude apprentices co-enrolling in units at higher levels although workloads would clearly be an issue (e.g. trade units and higher-level units in design and project management). That said, there was there agreement that there is an inherent inequity in some trades, for example, electricians, where the attainment and expected levels of mathematics or physics could be well beyond the lower levels of the AQF.