



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

Patrick Doumani

Respondent organisation (where relevant)

Federation of Parents and Citizens Associations of New South Wales (P&C Federation)

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

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.

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.

Other

P&C Federation's primary interest regarding the AQF is to ensure that all students have a viable pathway to a productive life upon leaving school. We commend some features in the Discussion Paper, such as the acknowledgement that the current AQF implicitly regards higher education as superior to vocational education. We note the following points:

- **There must be greater crossover of academic and non-academic experience:** If someone has little formal or academic training in a field, but nonetheless has extensive practical experience, there is currently little opportunity for them to utilise this practical experience under the AQF framework. The AQF should allow practical experience to translate to the AQF, as this would give students a pathway to professions that does not rely solely on formal training.

We also believe that there should be pathways by which a student's ATAR or VET course can translate to the AQF.

- **Reform the RoSA to be a qualifying document:** There is little in the AQF covering those who leave school before their HSC. Such students receive a Record of School Achievement (RoSA) which in practice does little more than confirm that they had attended school, and thus carries little weight among employers. The RoSA could be amended to be a qualifying document under the rubric of the AQF. We also note that the Discussion Paper (p.26) stated that assigning secondary school education may not be appropriate because school learning outcomes may not easily align with single or multiple qualification types. However, we believe there are viable ways of aligning vocational studies with qualification types. Moreover, students are entitled to leave school before their HSC, and we do not consider it acceptable for such students to be denied pathways to meaningful work.