



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

Dr John Griffiths, Chief Executive Officer

Respondent organisation (where relevant)

Queensland Tertiary Admissions Centre Ltd

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.

This submission is provided on behalf of the Queensland Tertiary Admissions Centre (QTAC) Ltd. QTAC manages the admissions to over 1700 courses offered at universities and other higher education providers in Queensland and interstate. Every year, thousands of applicants, including current school leavers, present qualifications from the AQF in support of their tertiary study applications.

For over forty years QTAC has worked to connect individuals with opportunities in tertiary education and training. We have relied on the AQF to help determine the merit of an individual applicant to a tertiary course, relative to other applicants, and as such we understand the framework, and its benefits and limitations, from a very practical point of view.

QTAC would like to offer a perspective on two issues raised within the context of the AQF Review: first, the part that credit transfer plays in the way prospective students select a tertiary course, and second, the way the AQF approaches microcredentials and other informal and non-formal learning.

Learners should be able to compare credit options

QTAC has a special interest in credit transfer as a topic within the AQF review. The allocation of appropriate credit should be regarded as a positive outcome for providers, learners, and the community, because credit recognises where learning has already occurred, and prevents wasteful repetition of instruction and evaluation. The cost to the community of subsidising study that delivers limited additional benefit to the learner can be reduced by ensuring that all learners access the amount of credit that that is consistent with their existing knowledge and skills.

Credit can be used to allow formal qualifications to be, at least partially, tailored to the individual and their existing skills and knowledge. Given the increasing demand for shorter, more focused learning that addresses individual skill and knowledge deficits, the ability to tailor formal qualifications is likely to become more important.

As noted in the *AQF Discussion Paper*, most prospective students are unaware of what credit they may be entitled to and how they could apply for it (p 32). This is a considerable disadvantage to prospective students, who are unable to fairly compare the offerings of different providers. For example, a prospective student with a completed diploma applying for a bachelor degree may be entitled to no credit, some credit, or an entire year of credit, depending upon the institution and the degree they choose. This can be equated to a potential discount of up to 33% on the entire cost of the degree, along with the saving of up to a year which could be spent in employment.

Despite this very significant difference, prospective students in such a position must usually make the election as to which institution and course *before* they can access this information. This disempowers the student, who cannot evaluate the options fairly, and reduces the benefit to institutions in offering competitive levels of credit.

Some institutions have mature credit arrangements codified in publicly available databases that an informed prospective student could access prior to applying. However, in QTAC's experience, prospective students are not always informed in this way: they do not know enough to appreciate that credit is a pertinent consideration, and they would not be confident in interpreting the information in the available databases, even if it were available for all institutions.

For credit information to be useful, it must be tailored to the prospective students, based on their verified existing qualifications, and available before the final selection of provider. One option that has been suggested during this review is that providers contribute to a database of credit arrangements and/or credit precedent. The great beneficiary of a such a database would be providers of study at diploma level and below, who would utilise such a resource as part of marketing their courses – this may in turn inform some portion of the market. For learners to be truly empowered, however, universities should proactively include credit information in tertiary offers, so that learners can evaluate each offer in terms of true cost and return on investment.

Microcredentials should be recognised as distinct forms of learning

At QTAC we engage daily with prospective students who are anxious about the future and their ability to compete in a changing workforce. Over the last two decades QTAC has seen a profound shift: where there was confidence about the power of tertiary education to ensure gainful employment and swift advancement, there is now uncertainty about whether it offers a return on investment for the learner. Those of us within the sector understand the many practical and personal benefits of higher education, but we are sympathetic to those who struggle to determine the value when media points to the underemployment of graduates from all disciplines.

This uncertainty is not created by the AQF, but the regulatory framework does not assist by creating a focus on compliance over innovation. Australia needs high quality, trusted qualifications and there must be a regulatory framework to ensure these standards.

The change is most evident in the rise of non-formal and informal corporate training, particularly 'micro' credentials. Much of the training that is undertaken by working Australians today is not recognised within the AQF, a distinct shift from the time when Corporate Australia would sponsor its future leaders through formal qualifications.

The rise of microcredentials reflects the corporate need for targeted, short and inexpensive skill and knowledge development, as well as the motivation of individuals to future-proof themselves against change.

The *Contextual Research for the AQF Review Report* indicated that the rise of informal and non-formal learning had resulted in a 'virtually unregulated system of individual institutional assessment and recognition of prior learning arrangements' (25 April 2018, 1.2.8.). In QTAC's experience, there is limited institutional recognition of informal and non-formal learning. Most of this learning is not undertaken to stack towards a macrocredential or as part of a pathway to a formal qualification.

This learning appears to be engaged in mostly to address existing needs, such as a technical skill deficit, with a small percentage of learners subsequently seeking to trade this learning in against a formal qualification. The opportunity certainly exists for higher education providers to become

more adapt at recognising and incorporating informal and non-formal learning into admission and credit arrangements, but there is no basis to suggest that a regulated system of recognition would benefit the sector.

We are concerned that the review of the AQF will lead to further regulation, with microcredentials and other non-formal and informal learning subsumed within the regulatory framework. This would be a troubling outcome given the fact that these forms of learning evolved specifically to fill the gaps and absences created by the inability of the sector to be nimble and responsive. If the AQF consumes these forms of learning, they too may become so constrained that they become less relevant to the needs of learners.

Microcredentials and other forms of informal and non-formal learning are distinctly different from the regulated learning within the existing framework. In fact, microcredentials are least successful when this distinction is not recognised. Microcredentials should not be thought of as a disaggregated degree: they should not be the same learning broken down into smaller chunks, or delivered through different modes, in different orders, or to different audiences. Microcredentials work best when they are developed specifically to address a narrow deficit, and remain in a constant state of evolution, continually developing to meet the needs that emerge as society, the economy and technology evolves. This form of continual evolution may be *possible* within the framework of the AQF, but the regulatory fatigue of the system is likely to stifle the drive to continue to innovate.

The role of the AQF in relation to microcredentials is not to bring the microcredentials into the existing framework, but to learn from the rise of microcredentials about the needs of the community and to use this knowledge to encourage more innovation in the development of formal qualifications.

QTAC thanks the AQF Review Panel for undertaking this important work and for providing an opportunity for consultation within the sector. We look forward to the outcomes and the positive changes that it will bring to Australian society.

Other

--