



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 Jasen Burgess, Director - Educational Quality & Standards

Respondent organisation (where relevant)

CQUniversity

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

The AQF is important to ensure the quality of Australian education by providing a means of comparability between Australian courses, and between Australian courses and international courses.

- CQUniversity supports the proposal to remove duplication of descriptors used because those currently used for qualifications at particular levels vary, which causes confusion.
- The exclusion of enabling courses may pose risks to assuring the quality of such courses across the sector since it becomes difficult to compare these courses and assess the level of outcomes students attain upon completion.
- Course durations expressed in years/hours are no longer fit for purpose given the myriad of ways in which courses are delivered, including through trimesters. However, removing any notion of a nominal duration from the AQF presents risks in terms of overly short courses, a problem that the Australian Skills Quality Authority (ASQA) has had to deal with in the Vocational Education and Training (VET) sector. The proposed credit-point system provides a

potentially more relevant alternative for determining course duration, however, it may not necessarily be the best fit.

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.

- CQUniversity supports the proposal to simplify the descriptors to 'Use AQF levels only to describe knowledge and skills and their application, and provide a description of each qualification type that is linked to levels' (p. 22).
- The qualification durations as currently expressed in the AQF in terms of hours/years are outmoded and do not reflect current practices, for example, trimester delivery.
- The use of credit-points as proposed in the discussion paper provides an alternative to time/hours-based duration that is more fit for purpose. However, a credit-points system is not necessarily suited to research higher degrees (RHDs). Instead, the question for RHDs is whether it is necessary to require a student to work on a project for 3-4 years to demonstrate appropriate research skills, eg Is the priority nominal volume of study or is it contribution, significance, quality and impact? For research, there could be two different roles that Universities can play:
 1. Supporting students to acquire research skills through a 'volume of learning' component since there are basic concepts that need to be taught, and then practised/demonstrated through a supervised research project
 2. Recognising and extending existing research skills (enabling a student to communicate those to a prospective employer) which could be considerably shorter in length, since the focus is on measuring/validating and augmenting existing skills.
- The co-location of Masters degrees by research and coursework currently causes confusion among students, as do creative research doctorates and professional practice doctorates in the AQF descriptors. There should be more guidance on the difference between these different types of Masters/Doctoral qualifications that sit at the same qualification level.
- Level 8 on the AQF is also focused on coursework qualifications which inhibits the development of pathways to research through research graduate certificates that are not built around coursework notions of duration.
- The inclusion of enabling courses within the AQF would facilitate comparability and help to protect the quality of these courses. Enabling courses could be situated across Levels 4-6 on the AQF, recognising that they may consist of a range of units of study that scaffold student learning from study skills through to critical thinking. This would facilitate enabling programs as both a pre-cursor to higher education study and a means of gaining some credit into higher education study.
- The descriptors are lengthy and written in language that is not easily accessible for academics or students. CQUniversity recently introduced self-assessment reporting against the AQF descriptors as a part of its six-monthly progress reporting for RHD candidates, and as part of a strategy to collect information on areas where students need assistance. The results demonstrated that students have poor awareness of these descriptors and struggle to understand their meaning. Therefore the data CQUniversity is collecting from students is less meaningful because AQF does not use language relevant to them, and this in turn limits our

ability to identify areas of genuine training need based on student reporting against AQF requirements.

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.

- The inclusion of micro-credentials, short courses and/or MOOCs within the AQF raises a host of regulatory issues in terms of who approves a micro-credential, how this is done, what types of organisations could provide approvals, and criteria for approval.

If such courses are to be included, then the scope should be as narrow as possible, and only those courses that closely align to existing qualifications on the AQF, that is micro-credentials, MOOCs and skills sets, should be included. There is already scope within the AQF for exit awards from courses embedded within Bachelor or Masters degrees, so the need to incorporate incomplete higher education courses within the AQF is not clearly established.

CQUniversity's preferred position is that providers should be able to determine how a micro-credential or MOOC meets AQF requirements for a particular level without the need for additional regulation. This can be achieved as part of credit transfer and recognition of prior learning policies.

Should micro-credentials, short courses and/or MOOCs be incorporated into the AQF, then their recognition should be restricted to registered higher education and VET providers. Otherwise, recognition of these courses could be a *backdoor* for un-registered providers to deliver 'stackable' qualifications through a series of micro-credentials, without having been through a rigorous institutional registration and full course accreditation process by regulator.

The inclusion of micro-credentials, short courses and/or MOOCs from non-registered providers also has the potential to dramatically increase the workload for tertiary sector regulators, which could have adverse effects on current registered providers subject to regulatory activity. Self-accrediting providers should be able to make determinations of their own as to the AQF level of their micro-credentials or MOOCs.

- The AQF volume of learning expressed in years/hours is not fit for purpose. A credit-points system could be more fit for purpose; however, such a system could be used alongside other guidance for duration and qualification outcomes. A credit-points system may not necessarily be suitable for all VET courses or for RHD courses, where alternative guidance may be required relating to substantive outcomes of these courses.
- There is a need to revisit the **significant** variation in duration between some Certificate qualifications, for example between Certificate III apprenticeships and other Certificate III courses.

Other

The inclusion of current AQF policies and guidance within the AQF would clarify their status.