



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

Prof Margot Kearns

Respondent organisation (where relevant)

The University of Notre Dame Australia

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

If the AQF is primarily considered to be a framework that provides transparency and informs students about what the different levels of qualifications are, then it meets that purpose (reasonably) well. It is also useful as a guideline for institutions when developing new programs to ensure that outcomes are designed according to the appropriate level. If, however, it aims to be a *quality assurance* instrument that promotes academic standards, then its utility is questionable.

The AQF must meet the needs of multiple stakeholders. That is, it must serve the needs of a) employers wishing to retrain and up-skill their workforces, b) individual learners seeking credit towards further learning, as well as c) institutions seeking to provide transparency around the standard required for various qualifications and credentials. Importantly, the AQF must also meet the needs of international (as well as domestic) students and ensure it provides pathways and synergies between it and international qualifications frameworks.

The AQF would benefit from greater clarity around levels and descriptors with less repetition

across AQF taxonomies.

Levels 8 and 9 need reconsideration. An honours degree doesn't seem to sit in the same category as a graduate certificate or graduate diploma. Likewise a master degree by coursework and by research are quite different, as is the extended master degree. Should the research masters be grouped with honours as both lead directly to a doctorate? Similarly, a graduate certificate and graduate diploma are really the first semester and first year of a master degree, and are often nested qualifications. Should there be a bifurcation after level 7 with a research path and a coursework/professional path. Modifications in this realm are considerable and would necessitate a large rethink and rebuild of the AQF. Institutions underwent considerable adjustment to be compliant with the current AQF – there is little appetite in the sector for another major overhaul.

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.

A wider range of credentials than are currently in the AQF (microcredentials etc)

The workplace in the 21st century is a moving feast and employees need to keep abreast of a constantly changing landscape. Employers require employees to retrain on an 'as needs' basis to carry out evolving tasks. As such, people will regularly move back and forth between learning and work contexts to ensure that they have the requisite skills to maintain employment. Tertiary education institutions will need to adapt to these changes in the workplace by creating responsive and customisable pathways for students that will enable them to easily traverse between VET and HE courses, as well as informal learning that has been undertaken as part of professional development within the workforce.

Any review of the AQF should consider the need to recognise lifelong learning that takes the shape of short, micro courses that can be stacked or configured in multiple ways to make up complete qualifications. A complete 'configuration' might include courses that have been drawn from either the HE or the VET areas and are fit for purpose (purpose being either the employer's requirements, or the student's interests).

Smaller units of learning are becoming more appealing (to employers and to students), so there is a growing need to develop a means by which microcredentials can be formally recognised or accredited. However to incorporate them in the existing AQF would require an extensive redesign of the AQF. Alternatively, as providers are already recognising microcredentials, to avoid inconsistent and ad hoc recognition of micro learning across the sector, comprehensive guidelines for those developing short courses and those crediting them towards AQF qualifications would be useful. Individual institutions would have to develop recognition policies consistent with any AQF guidelines.

More clarity on treatment/recognition of enterprise and social skills

Transparency and recognition of basic skills (literacy, numeracy, digital, communication) and technical skills (relevant to the discipline), as well as higher order entrepreneurial skills (critical thinking, initiative, leadership, problem solving), in qualifications is necessary to allow students and employers to better understand the learning opportunities that are available when undertaking further study. The development of these enterprise skills, therefore, should be embedded in course content and should be assessed against graduate attributes at the program and institutional level. The AQF needs to make reference to these different types of skills (soft and hard). Including a requirement in the AQF for the acquisition of social and enterprise skills to be contextualised in the learning outcomes from specific qualifications instead of prescribing them within the taxonomy of learning outcomes would provide a way to recognise their importance without adding complexity to the framework.

AQF taxonomies and levels (clarity thereof, of the existing framework)

The descriptors of levels are overly complex and/or vague. At times there is not enough detail to assist in fully understanding the difference between levels. Also, there is a lot of duplication and overlap between descriptors which does not help when trying to decipher how they are qualitatively different. An example is:

Skills Level 7

Graduates at this level will have well-developed cognitive, technical and communication skills to select and apply methods and technologies to:

- analyse and evaluate information to complete a range of activities*
- analyse, generate and transmit solutions to unpredictable and sometimes complex problems*
- transmit knowledge, skills and ideas to others*

Skills Level 8

Graduates at this level will have advanced cognitive, technical and communication skills to select and apply methods and technologies to:

- analyse critically, evaluate and transform information to complete a range of activities*
- analyse, generate and transmit solutions to complex problems*
- transmit knowledge, skills and ideas to others*

While there are some adjectives that aim to distinguish these descriptors (e.g., well-developed vs advanced), these descriptions are largely the same, rather than being qualitatively different. Furthermore, it is not clear what is meant by the adjectives that aim to differentiate the descriptions (e.g., how is 'well-developed' qualitatively different from 'advanced'?). If this overlap is to remain, then in order to eliminate the possibility of misinterpretation, it will be important for the AQF to provide access to clear and unambiguous examples of what descriptors mean.

Additionally, the placement of qualifications at certain levels is confusing. For example, (as mentioned above) should the Bachelor Honours Degree, Graduate Certificate and Graduate Diploma all be at the same level (8), particularly in light of the variation in the volume of learning for each of these qualifications? Given the clear difference in volume of learning between the Grad Cert and the Grad Diploma, should these qualifications be on different levels? If this means increasing the overall number of levels available in the AQF, then that should be considered.

Also there is inconsistency in the duration of different master degree structures. Some master degrees vary from 18 months to beyond two years full time (e.g., Master of Teaching vs MD vs Extended Masters).

Volume of Learning

Presently volume of learning is defined in the AQF as a notional indicator of duration assigned to different qualification types and the range specified reflects the level of complexity required for the qualification type. To an extent this is workable for established qualifications where there is a good understanding of what is expected of graduates. As such, the volume of learning ranges specified in the AQF for different qualification types should be retained. However a 'standard length' of program should not solely dictate volume. Rather, learning outcomes should also be a determinant for determining volume.

Re-defining volume of learning as a unit of measure of workload in hours to provide the clarity and transferability necessary to support development and accreditation of qualifications in new and emerging areas would need to accommodate diverse and new models for delivery. Although the concept of measuring volume of learning in hours has its merits, it could differ substantially between fields of study. Retaining years as a measure might be more practical, as it allows for that

differentiation. Irrespective of the model/system that is considered, learning outcomes should also be a driver for determining volume of learning.

The use of a credit point system for completed qualifications would be dependent on an agreed understanding of volume of learning and how it should be applied when developing and accrediting qualifications and therefore, should be viewed as a longer term initiative. In some respects, redefining volume of learning from being a notional indicator of duration to an actual measure of workload may be the greater conceptual shift, as existing structures are already in place for assigning workload-based (EFTSL) credit points for completed study and for recognition for prior learning.

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.

Qualifications Pathway Policy. The University would support the development of a shared credit transfer register for the purpose of transparency across the sector and ease of access for students, subject to the implementation of suitable mechanisms to ensure that the diversity of individual institutions' programs are recognised as central to the decision to grant credit transfer/ RPL. The development of a precedent system is not supported as these are decisions involving academic matters properly residing within a particular institution.

The provision of guidance notes rather than a policy document is welcomed in terms of pathways and credit, being a more suitable instrument to provide nuance and specific advice on credit pathways.

Qualifications Issuance Policy – this should be retained in the AQF Framework for the stated reason that there is value in setting out a single approach to the issuance of academic records across the tertiary sector.

Other

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