
SUBMISSION

Review of the Australian Qualifications Framework

March 2019

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RESPONSE TO EXPERT PANEL'S DISCUSSION PAPER

The Business Council of Australia (Business Council) welcomes the opportunity to make a submission to the Expert Panel's Review of the Australian Qualifications Framework.

In the discussion paper released by the Expert Panel in December 2018, the Panel noted it had identified three broad questions for consideration. The Business Council's submission is structured around these questions of fit for purpose, reforms needed, and implementation concerns.

As submissions have been limited to 3000 words, the Business Council has focused its attention on its top priorities, but supports the Expert Panel making recommendations across all the areas canvassed in the discussion paper.

KEY RECOMMENDATIONS

- **Recommendation one:** The Expert Panel provides advice to the government that the purpose of the Australian Qualifications Framework (AQF) needs to be modernised and broadened with a focus on facilitating an agile workforce and lifelong learning.
- **Recommendation two:** The Expert Panel should place knowledge and skills on an equal level in the AQF taxonomy, with the accumulation of both valued equally. AQF descriptions should be rewritten to reflect the change of value.
- **Recommendation three:** The Expert Panel should rewrite the definitions of cognitive and technical skills to recognise that creativity and the use of intuitive and critical thinking are in both domains.

FIT FOR PURPOSE

Given the current objectives the AQF is largely fit for purpose

The Expert Panel has asked respondents to consider in what ways the AQF is fit, or not fit, for purpose. In the discussion paper the Expert Panel highlights the contextual issues for the review and proposes some potential areas for change, but the terms of reference do not allow the Expert Panel to explicitly consider the current purpose of the AQF.

The AQF was last reviewed seven years ago, and there has been significant change in both the labour market and the post-secondary education and skills system in that time. Changes highlighted in the discussion paper include the increasing importance of skills and knowledge; the changing nature of work; the stronger focus on what the Expert Panel refers to as enterprise and social skills; and the preference of employers for micro-credentials to supplement qualifications. The Business Council would add two additions to this list: the imperative to shift to a culture of lifelong learning; and the increasing divide between the valuing and treatment of the vocational education and training (VET) and higher education (HE) sectors.

While these changes are significant, and Australia's post-secondary education and skills system must adapt to respond to these changes, the Business Council would argue that the current objectives of the AQF do not allow room for consideration of these issues.

The current objectives are designed around the primary purpose of the AQF to promote transparency and linkages across the education sector. If the objectives alone are examined, it could be argued that the AQF is on the whole fit for purpose, albeit there are issues around interpretation and implementation that need to be addressed. However, the current objectives are not broad enough to contemplate the inclusion of micro-credentials, the changing nature of work or the focus on enterprise and social skills.

But the purpose or objectives of the AQF need to be modernised

As noted by PhillipsKPA, while Australia was once a leader in qualifications frameworks, other countries have moved beyond Australia's framework towards *qualifications frameworks as a tool to facilitate an agile workforce suited to rapid technological, industrial and social change.*¹

The Business Council has previously argued that the post-secondary education and skills system is our greatest asset as rapid technological and digital change alters the tasks and capabilities required to stay in work and lead successful and fulfilling lives.² But the Council has also argued this great asset needs fundamental change to be fit for purpose, and the AQF is part of that.

This review provides an opportunity for Australia's qualification framework to reclaim its place as a leader, by creating an AQF that has longevity in the face of the challenges Australia is facing. Such an AQF would continue to have a key objective of transparency and linkages but would also have an explicit purpose to facilitate lifelong learning by recognising a wide range of credentials offered in a variety of settings (i.e. not just educational institutions) that support the reality of modern workers and lifelong learning – flexible and multi-directional pathways, not simple hierarchical ones.³

Recommendation one: The Expert Panel provides advice to the government that the purpose of the AQF needs to be modernised and broadened with a focus on facilitating an agile workforce and lifelong learning.

REFORMS NEEDED

The Business Council supports the Expert Panel's proposals in the discussion paper and has ranked them in order of priority:

1. Review the application of knowledge and skills domain of the AQF taxonomy and how it should be applied across the AQF levels.
2. Include shorter form credentials in the AQF.
3. Revise descriptors to simplify them and ensure clear distinctions between levels.

¹ PhillipsKPA 2018, *Contextual Research for the Australian Qualifications Framework Review*, p. 9.

² Business Council of Australia 2018, *Future Proof: Australia's Future Post-Secondary Education and Skills System*, p. 4.

³ PhillipsKPA 2018, *op. cit.*

4. Expand the list of enterprise and social skills included in the AQF, and suggests the Expert Panel draws on the Business Council's *Being Work Ready Guide* (see attached) that details the values, behaviours and skills employers expect from all workers.
5. To help facilitate pathways between levels and qualifications, develop an hours-based credit point system in the AQF.
6. Develop a shared credit transfer register.
7. Use AQF levels only to describe knowledge and skills and their application.
8. Revise the Pathways Policy as guidance.
9. Revise the SSCE descriptor to recognise that the knowledge and skills acquired in the SSCE can be at a broad range of AQF levels and result in multiple pathways.

The Business Council believes these reforms are important building blocks for modernising the AQF and ensuring its longevity in a labour market subject to rapid change. However, there is one reform that the Business Council believes is fundamental to the effectiveness of a modern AQF.

The AQF privileges knowledge over skill

The current AQF privileges knowledge, and the accumulation of knowledge, over skill. The structure and descriptors are built around a silent assumption that the accumulation of knowledge is harder, and a more valuable outcome, than the accumulation of skill.

The only way to achieve the highest level in the AQF is firstly to undertake it in a discipline taught in higher education, and secondly to accumulate a depth of knowledge. While the level of skill theoretically escalates in the descriptors, one could argue that the initial skill set attained in a first qualification is honed, rather than a new skill set being developed. Does a historian who has completed an honours thesis and goes on to complete a doctorate really increase their skills, or are they simply refining and applying their core skills while accumulating more knowledge?

Accumulation of knowledge and skill need to be equally valued

Accumulation of knowledge should be a foundation of the AQF, however accumulation of skill should be an equal foundation.

The AQF assumes that disciplines with more knowledge accumulation are of a higher-level order; that because they focus on knowledge rather than skill they are more difficult and should therefore be at a higher level. This fundamentally ignores the concept that skill is also cumulative, and that skill accumulation, found more in the technical than professional disciplines, is as complex and difficult as knowledge accumulation.

Graduates from all qualifications should have knowledge that provides them with a framework for thinking and problem-solving, as well as a set of skills that enables them to work in their chosen field. The ability of an individual to work in their chosen field is their ability to apply their cumulative knowledge and skills, but disciplines and qualifications do not have the same ratio of skills and qualifications.

Some disciplines have an equal balance of knowledge and skills such as medicine and nursing; some are weighted to knowledge over skills such as the humanities; while others are weighted to skills over knowledge such as wood turners. Despite these differences, qualifications and disciplines that are weighted towards skills over knowledge tend to be in the bottom half of the AQF ladder.

Additionally, this split of knowledge and skills is not borne out in the labour market where qualifications are used. The AQF descriptors appear to be written from a perspective that disciplines or qualifications weighted towards skills have limited knowledge accumulation. For example, under its current construct the AQF has no room for the equivalent of the German *Meisterbrief*, which explicitly acknowledges that knowledge accumulation is a core component of some trade or technical qualifications.

While technical roles or caring qualifications will have less knowledge accumulation than most professional qualifications, they will still require some knowledge accumulation. Learners will not be able to apply the skills in those qualifications without the knowledge, and learners won't be able to accumulate knowledge without acquiring a level of skill.

Recommendation two: The Expert Panel should place knowledge and skills on an equal level in the AQF taxonomy, with the accumulation of both valued equally. AQF descriptions should be rewritten to reflect the change of value.

Creativity and critical thinking are needed in both cognitive and technical domains

This privileging of knowledge is compounded by the descriptors of knowledge which separate cognitive skills 'cognitive and creative skills involving the use of intuitive, logical and critical thinking', from technical skills 'technical skills involving dexterity and the use of methods, materials, tools and instruments.'

A less coded way of putting this would be to say cognitive skills are attributed to professional roles where thinking is required, and technical skills are attributed to technical and trade roles where physical work is required.

What this ignores is that like the technical and trade roles, professional roles are following a set of clear rules that use methods, materials, tools and instruments. The teaching and learning that higher education students are exposed to across multiple disciplines such as law, engineering, architecture, science and medicine, give those graduates a method of thinking, and a set of rules within which to operate to achieve outcomes.

The evolution of artificial intelligence (AI) and the increasing use of AI and robotics in professional roles demonstrates that there is significant routine work in 'cognitive' disciplines, and that there is also a significant amount of work that is bound by a set of clear rules. That is why professional work, such as legal discovery, components of accounting and surgery can be automated.

This work requires cognition, but it does not require creativity, intuition or leaps of logic. Yet the graduates working in these fields who would have been doing this routine work before automation would be graduates from AQF levels 7 to 10 – with those levels having been assigned primarily because of the level of knowledge accumulation and cognitive skill in the qualification. The inclusion of creativity, intuition and logic within cognitive skills sits behind this and is deeply flawed.

In the current construct of the AQF and the way the descriptors are applied at each level, to limit creativity and critical thinking to cognitive skills is to suggest that these are the domain of higher level AQF qualifications and primarily qualifications offered within higher education.

At its best this is an unconscious bias towards traditional learning and the accumulation of knowledge over technical abilities and accumulation of skill. At its worst it is snobbery that reinforces the view that traditional learners, *‘those who are good memorizers and good at analytical reasoning’*⁴ are more intelligent.

Creativity and critical thinking lead to excellence

In many ways, creativity or critical thinking is what separates competence from excellence.

All workers who apply the knowledge and skills they accumulated through their studies to deliver work that meets a minimum standard, and the rules of their profession, are competent. It is when workers are confronted with situations that are outside the rules, or are facing an unreasonable time pressure, or dealing with a difficult person, that creativity and critical thinking come to the fore.

A furniture maker can design furniture that is aesthetically pleasing, able to be mass produced and therefore be profitable and the foundation of a business. They would be following the rules they had been taught, applying their knowledge and using their skills to be competent. But if the furniture maker wants to explore new areas and break traditions, they will need both creativity and critical thinking.

If a doctor is presented with a patient with a diverse range of symptoms that do not fit within a traditional diagnosis, the doctor who solves the case will be a doctor who is being creative and applying their knowledge and skills in a different manner. The rules they have been taught do not give them the answer, so they must solve the problem outside them.

All jobs in the labour market require creativity and critical thinking, as these are the basis for problem-solving. While the problems that a labourer must solve will be less complex than the problems that an architect will need to solve, both workers will need to draw on the skills and knowledge they have developed. It is creative and critical thinking that separates the output of workers and is equally applicable across professional, technical and trade, community and personal service workers, managers, and sales workers.

Recommendation three: The Expert Panel should rewrite the definitions of cognitive and technical skills to recognise that creativity and the use of intuitive and critical thinking are in both domains.

IMPLEMENTATION

Recognition of the value of skills and accumulation of skills

The recognition of skill having equal value as knowledge would have implementation issues. The positive outcomes would include:

⁴ Business Council of Australia 2017, *Future-Proof: Protecting Australians Through Education and Skills*, p. 45.

- Recognising the value of VET qualifications which have a stronger focus on skill accumulation and are therefore currently less valued. The Business Council notes the Expert Panel's comment that reform of the AQF alone will not raise the status of VET. The Business Council agrees, however the AQF is the foundation of Australia's post-secondary education and skills system and therefore plays a role in establishing the importance of the VET sector and VET qualifications.
- As noted in the discussion paper there are concerns about postgraduate coursework programs being categorised at the same level as research qualifications. Postgraduate coursework programs are more focused on the accumulation of skill than research programs. Placing knowledge and skill on the same level would explain why coursework programs are equivalent.

A potential negative outcome would be that VET qualifications, particularly traditional trades, may be elevated on the AQF scale, which would have significant flow-on impacts to the workplace relations system, including Modern Awards. While this is a legitimate concern and one that would need to be carefully worked through, it is not a justification to maintain an inherently biased system.

Including shorter form credentials in the AQF

The Business Council strongly supports the proposal to include shorter form credentials, including micro-credentials, in the AQF. The Council has long advocated for a cultural shift to lifelong learning and supporting workers to dip in and out of education and training while remaining in the labour market.

In designing the new AQF however, it will be important to ensure that the framework does not result in a new regulatory system that seeks to regulate the creation of each micro-credential. Micro-credentials should be built around the unique needs of the learner, and should not be constrained by a new accreditation system.

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