



Review of the Australian Qualifications Framework

Discussion Paper Response Form

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Respondent name

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Respondent organisation (where relevant)

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

Summary

- The AQF has helped to establish the importance of skills, learning, training and certification in Australia, created a benchmark that has supported the foundation for national skills standards and improved international competitiveness.
- The AQF could be improved by incorporating greater flexibility, improving recognition of industry contributions and learner preferences, creating closer alignment between qualification and competence, and supporting changes to compliance and volume of learning.

Fit for Purpose

The AQF has helped to drive the culture of Australia towards a greater recognition of the importance and roles of skills, learning, training and certification as central to future prosperity and current international competitiveness.

The AQF has assisted in the development of the national VET competency and skills standards framework, available through Training Packages. This includes considerable Intellectual Property, funded by the Commonwealth Government and delivered through a structure based on industry representation and connection through the Australian Industry and Skills Committee and Industry Reference Committees. Industry is well engaged and active in the skills standards review and development process.

The AQF has resulted in international recognition of the quality of Australian qualifications, and has assisted in opening up international markets for Australian organisations working in education and training.

The AQF has helped Australian graduates to compete for jobs nationally and

internationally, and improved the mobility of the workforce.

Not Fit for Purpose

The AQF has the appearance and structure of a hierarchical system where learners take a single-direction journey upward through qualification levels. Current research suggests that workers will have multiple careers and will need recognised qualifications from multiple levels. Learners are also seeking qualifications recognising the enterprise and social skills that help them with “social productivity”, “community productivity” and “capital productivity” (ideas and IP), not just the “workforce productivity” mentioned in the Discussion Paper. Learning is multifaceted and learners are looking to expand horizons to find ways to contribute more broadly to their families, communities, business and societies.

The AQF appears to be contributing to a lack of flexibility in recognising the multiple ways that learning is undertaken. Learners are showing a preference for anytime, anywhere learning, and there is increasing emphasis in formal education and training on self-directed learning. However, gaining qualifications almost always requires enrolment, and most institutions have policies limiting credits through Recognition of Prior Learning. In an exercise undertaken by Skills Impact in late 2018, not one RTO contacted concerning assessment of a competent professional staff member with significant experience referred to Recognition of Prior Learning or equivalency assessment as an appropriate pathway. The only option offered was enrolment in existing qualifications despite the staff member’s demonstrated skills, knowledge and experience.

Specifically in the VET sector, Skills Impact believes the AQF needs to formally recognise the changing nature of learning and industries’ responses to this through a range of workplace-based learning activities within the current system. Many skills are best learnt on the job due to the nature of the specific skills formation and the needs of learners in employment. The current system could focus on workers and on the job learning, but instead focuses on RTO delivery. The AQF has led to greater emphasis on formal education and training at the expense of formal competency assessment and certification, including industry, informal and non-formal training and learning.

As identified by the discussion paper, generally industry believes that completion of a qualification through an education and training pathway does not prove and is not the equivalent of competence developed in a workplace through applied job learning in combination with formal education. Significant workplace-related practice is required before proficiency is attained and industry should be involved in providing the means for practice and sign-off on competence.

Currently the AQF is an element in a system that encourages the adoption by education or training providers of particular business models. Income (direct or through funding) is derived from enrolment, teaching, training and research. This creates a barrier to recognising previous learning and experience, and in particular industry-based training and experience. This leads to bodies actively disrupting the quality assured and regulated market and offering non-AQF but highly recognised accreditations, such as the Graduate Australian Institute of Company Directors certification and similar certifications from many professional bodies.

The AQF currently penalises self-directed and industry-based learning. Due to the prevailing business models and the cost of compliance for Recognition of Prior Learning requirements, recognition through the issue of a qualification based on experience and demonstrated skills, knowledge and competencies has become more difficult, rather than easier. The focus is on enrolment (delivery) rather than assessment (recognition).

The AQF is not “underpinning” compliance, it is being used as the foundation to police compliance, to the detriment of driving continuous improvement and innovation. Instead of providing the foundations for quality, it is being utilised to identify areas for regulation. As a result, regulation and compliance is widespread across all elements of education and training, rather than being focused on specific areas where regulation may be required. For example, ASQA does not consider the content of Companion Volumes in audits, which leads to compliance issues related to context, criteria, flexibility of approach and volume of learning.

There have been delivery issues in the VET sector in particular, which has led to more complex and rigorous compliance, taking up more time and resources. The volume of regulatory compliance leads to RTOs ensuring compliance boxes are ticked rather than utilising the framework and strategy-driven compliance for innovation and continuous improvement. An example of the impact is that high quality trainers are being excluded from training because they don't hold requisite qualifications, regardless of expertise in industry, supervision and training. Increasingly RTOs don't have the time and resources to undertake a detailed examination of candidate credentials and to go through the “exception” compliance processes, instead undertaking recruitment by establishing a baseline of holding specific training and education related qualifications, regardless of proven competency.

Volume of Learning is proving to be contentious and difficult to apply. While the AQF provides guidelines, the reality is that volumes are being driven by funding availability and cost considerations, variations in delivery and training methods, and resource issues (often outside of the control of education and training institutions). Skills Impact agrees with the observation in the discussion paper that Volume of Learning is being affected by reasons other than learning methods or student needs.

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.

Summary

The most urgent priorities are:

- Reframing the AQF system, including diagrammatic representation
- Appropriate identification of “relevant approved bodies” for the issuing of qualifications (Currently in the VET sector restricted to RTOs only)
- Appropriate incorporation of more flexible learning leading to qualifications, including short-form and industry-based systems
- Reconsideration of “pathways”
- Addressing the current misuse of AQF as a driver rather than a foundation for

compliance

Discussion

Skills Impact suggests that the starting point is found in the definition of qualification in the Discussion Paper: *“A formal certification, issued by a relevant approved body, to recognise that a person has achieved learning outcomes or competencies relevant to identified individual, professional, industry or community needs.”*

The AQF should be primarily concerned with recognition of skills and knowledge, as assessed through competencies and learning outcomes. Instead, it appears to be primarily focused on education and training, and this is embedded in AQF objectives, with four of the seven directly referring to “education and training”.

Skills Impact suggests there should be greater emphasis on the other objectives, and on the overarching approach of ensuring that learners with skills, knowledge and proven competencies are able to have them recognised through a formal certification. The AQF is currently unbalanced: Too much focus on education and training delivery, and not enough emphasis on assessment of skills, knowledge and competencies.

Given this, the most urgently required reform is to the foundations of the AQF. The hierarchical and apparently linear structure, and the over-emphasis on education and training, inhibit the required flexibility. It must be clear to all stakeholders in the AQF, including learners, regulators, training providers and industry, that the AQF is flexible and designed to recognise each attainment of a set of skills, knowledge and competencies that are relevant to workforce and social roles, rather than an ever increasing, unidirectional body of knowledge and skills.

This would look more like a networked system than the current AQF representation, or any of the international representations in the attachments to the discussion paper. It may look something like a system of lakes (AQF level with summary, purpose, knowledge, skills and application of knowledge and skills) connected by a series of rivers (multifaceted pathways, single and multiple learning methodologies, assessment authorities, issuing authorities), each of which may connect with more than one lake. In addition, consideration could be given to changing the terminology “AQF Levels”, to better reflect the nature of the qualifications rather than the hierarchy. This could change the focus to the depths or intensities of AQF qualification achievements.

A limitation of the AQF is the appropriate identification of “relevant approved” bodies to issue qualifications. These are intrinsically linked to education and training institutions, rather than to bodies that can appropriately assess skills, knowledge and competence (which would be a broader category including industry-based organisations as well as the current education and training institutions). Consideration should be given to expanding the nature and type of “relevant, approved” bodies, including trade, industry and professional organisations able to demonstrate validated assessment approaches (the AQF already provides for this in part, though this is not widely recognised and often seen as relating only to licensing and regulatory authorities). Consideration should also be given to encouraging current approved bodies to utilise the AQF to undertake assessment of skills, knowledge and competencies without enrolment in a formal training pathway as a mandatory prerequisite, which is the way it is mostly being used currently.

The AQF needs to be a flexible framework that encourages actions and support that may recognise and incentivise the work and expertise of both workplaces and RTOs in the delivery of competency, which benefits the long-term skill building of the nation. There is value in directly incentivising industry to train for the benefit of Australia. The recent and dramatic drop in traineeships and apprentices including in the area of high demand occupations is a direct result, in our view, of the removal of incentives for employers to train to a nationally recognised standard. Employers are still training, but without incentives, are training to in-house standards, which does little to lift the national numbers of qualified workers across industry in Australia. While the current governance model is outside the scope of the AQF Review, it is important that the AQF does not tilt the balance towards focus on institutional education and training providers, given that it is questionable whether having so much focus on this is the best way to deliver and recognise competent workers across Australia.

In this regard, we question the Specifications for Qualifications included in the AQF, with the requirement for entry into the AQF Register in line with the AQF Qualifications Register Policy. This inhibits the attainment of personalised qualifications (whether learner or industry driven) and the use of short courses, MOOCs, industry training and short-form approaches to achieve qualifications, and creates a barrier to achieving a qualification which may include skills, experience and competencies at varying "levels" of the AQF. We would also question whether this reflects real practices: for example, Bachelor of Laws (AQF 7) graduates often then complete a Graduate Diploma (AQF 8) to become entitled to practice, but it would be hard to argue on purpose, knowledge, skills, content and volume of learning that the practice requirement should sit at a more complex level than the foundational degree.

Skills Impact suggests that this is one of the inhibiting factors in appropriately recognising shorter form credentials, especially formal Skill Sets and micro-credentials. The discussion paper notes seven requirements for shorter form credentials to meet minimum requirements for inclusion in the AQF. We would suggest the review consider alternative approaches, focusing on the qualification rather than the means to attain the qualification. The qualification needs to meet the seven minimum requirements outlined. Whether a learner utilises self-directed learning, short-form training, industry-based training and experience, or enrolled training in either a formalised program or a series of selected, individualised courses, should not be the deciding factor in whether a learner should achieve a qualification.

While Skills Impact focuses on the VET sector, this lack of flexibility applies across all AQF levels. Even at AQF 10 where there should be a clear expectation of self-directed learning, achievement and attainment, there is a current requirement for enrolment and supervision, regardless of career, entrepreneurial, academic or research achievement, before a formal (non-Honorary) doctorate can be achieved, with many Universities requiring work to be only undertaken during the enrolment period (at least for traditional thesis-based degrees).

If the assessment for a qualification can be quality assured under government approved standards (and potentially ensure national skills standards are met), and if the qualification can be described according to the AQF descriptions of learning outcomes and be located at an existing AQF level, this should achieve the objectives of the AQF as

they relate to skills, knowledge and competency outcomes. Skills Impact would argue that requirements relating to authorities being recognised under legislation, having clear pathways and not duplicating existing AQF qualification types are restricting flexibility without adding any clearly defined value. These elements do not need to be mandatory and can be flexible guidelines to provide a more usable and flexible framework.

Skills Impact also submits that the notion of Pathways needs to be reconsidered. Traditionally, pathways have been educationally described and provide for movement with a focus of traveling up levels. In addition, institutions have offered “double degrees” where qualifications are at the same AQF level. The AQF should also provide for approaches allowing the achievement of multiple qualifications at multiple AQF levels through the same program (or ongoing program) of gaining skills, knowledge and competencies. For example, a person focused on production horticulture may be able to achieve a trade qualification, a post-trade specialisation and a Diploma in Agronomy through a simultaneous and ongoing learning process (potentially with separate “issue of qualification” points) which will include workplace experience. This approach creates focus on the formal recognition of achievement of learning outcomes and competencies, rather than the formal education and training scheme.

As noted earlier, people are changing careers and roles in communities more often, and this will result in the need to move between levels in all directions over the journey of lifelong learning. Recognition that pathways must now meander, and have bridges for crossing career chasms, will also help to meet the current demand for anytime, anywhere and personalised learning.

In particular in the VET sector, there is a need to change the current focus applied in the auditing of RTOs. It is not necessarily delivering improved vocational skills outcomes but is severely inhibiting training providers and workplaces from responding creatively to the development of skills, particularly in remote and regional Australia and in sectors with small and thin training markets.

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.

Summary

Major implementation issues include:

- Working with education and training providers to establish greater flexibility in the system, given the substantial changes that may result for system improvements
- Ensuring auditing and compliance is appropriately adjusted to meet the aims of the AQF for strategically-driven compliance, and regulation only where required
- Maintaining alignment with international systems and expectations

Discussion

Industry stakeholders actively involved in the standards review and development process consistently maintain that there could, and should, be greater recognition of

training undertaken in workplaces and their role in competency assessment. Learners are consistently demonstrating by their actions, a desire for anywhere, anytime learning and the availability of multiple pathways to learning, including short-form approaches.

Currently there is little or no opportunity for industry or enterprises to be involved in formal, recognised training delivery, even with an established relationship with an RTO. Training providers are, by necessity, motivated by existing enrolment numbers, enrolment opportunities, RTO business viability and reduction in regulatory risk. This means that to deliver training, they need to see sufficient historical demand or anticipate new demand for training in the particular sector.

As a result of well-known institutional delivery problems, many employers have forsaken the VET system to deliver their own in-house training and assessment programs. These programs have resulted in highly competent employees who are unable to obtain a formal qualification or independent evidence of competency. This has a potential knock-on effect with regards to transportability and flexibility of the workforce.

The AQF, if it became more flexible, would encourage the use of national training standards by in-house and industry trainers, to allow for learners to achieve formal recognition of their attainment of skills, knowledge and competency through a qualification.

This is not going to happen unless the education and training sector also becomes more flexible in their business models and guided learning approaches. There is a need to encourage and develop partnership approaches, and to ensure there can be assessment prior to or without enrolment.

Skills Impact recognises that the flexibility and adaptability of education and training providers, particularly those that are not self-assessing and in the VET sector, are limited by regulatory and compliance requirements. Ensuring that regulators approach the AQF as a foundation for improvement and innovation and not just as a regulatory tool identifying areas of regulation is imperative.

Skills Impact also recognises the difficulties in ensuring international acceptance of major changes to the AQF. The international education and training sector has become a major contributor to the Australian economy and has contributed to Australian competitiveness. Ensuring international acceptance will be a requirement for any AQF changes.

Other

Additional Issue

In designing training packages based on national skills standards and on the AQF, Skills Impact has encountered issues related to the clear identification of specialisations and advanced skills in job roles, when related to the entry levels for programs at AQF levels 1-5. There is an expectation from States, based on the standards, that there will be direct entry, reasonably free from entry requirements, into qualifications at all AQF levels 1 – 5, yet there is a need to have foundational programs and advanced or specialisation programs, where the appropriate level will be AQF 4 or 5. An example is

in Veterinary Nursing where the Diploma level (AQF 5) should be an advanced program, given that it prepares veterinary nurses for emergency situations, more complex surgeries and advanced practices. The purpose, skills, knowledge, application of skills and knowledge and volume of learning are all suitable for an AQF 5 program. The industry believes, with justification, that this formal certification should have an entry point of the Certificate IV or equivalent, and additional work experience, however the current standards as applied make it difficult to impose entry standards of this nature for any AQF level 4 or 5 program.

This is an example of a situation where qualifications should and could be built as someone advances through an occupation (potentially in a continuous learning process with multiple recognition points), but where the AQF levels and lack of flexibility have had an impact on designing appropriate training and assessment.

Organisation and Submission Background

Skills Impact is a not-for-profit organisation that works across Australia to benchmark learning and skills standards for industry. Through our work, learners and workplaces have access to nationally consistent skills standards and qualifications, supporting greater employment opportunities and industry competitiveness.

We collaborate with industry, government and training providers, to review and develop vocational units of competency, skill sets and qualifications. Working with industry and government, we are able to track industry trends and document skills opportunities and challenges.

Our submission is based on widespread work and consultation with Industry Reference Committees (and predecessor bodies), employer and employee bodies, industry experts, training organisations and government over nearly 30 years. The submission is not made on behalf of any of these bodies. It reflects the understandings and potential solutions developed by Skills Impact based on this work and consultation.