



# 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](mailto: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

Andrew Morgan

## Respondent organisation (where relevant)

Monash College Pty Ltd

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

Monash College welcomes the current review of the AQF as an opportunity to future-proof this already strong and well-regarded framework. Beyond revising minor anomalies, the review should aim to recognise the increasingly globalised and internationalised nature of education and the need for greater flexibility in recognising a wider variety of verifiable learning.

These opportunities are noted with the caveat that no change should be considered that might compromise or diminish associated quality standards, the good standing of the AQF internationally, or Australia's reputation as a provider of world-class education. Therefore the first priority should be to maintain and protect quality, whilst also responding to changing patterns of education and needs of students.

**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.**

In the opinion of Monash College, the most urgent priority in reforming the AQF is in relation to the first issue raised in the Discussion Paper's section on areas for possible change: ensuring flexibility to enable the broadest possible recognition of verifiable learning.

As noted in section 4.1 of the paper, this issue will (or should) encompass a range of options such as shorter form and incomplete credentials. Nevertheless, this submission will focus on one specific example raised in the discussion paper, with a view to making two key points concerning an area of particular relevance to Monash College and on which the College considers itself well placed to comment:

- the importance of distinguishing Foundation Programs as defined by ESOS from the majority of 'foundational' learning cited in the discussion paper; and
- the option of a more appropriate and constructive alternative placement of Foundation Programs within the AQF, alongside the SSCE.

In addition to this issue, Monash College suggests other priorities for the current review should be:

- reconsidering volume of learning in light of now-widespread variations in institutional study periods, which could be more appropriately represented in terms of hours;
- simplifying and removing duplications of taxonomy, in the interests of ensuring the AQF is as clear and easy to understand as possible;
- updating the existing AQF generic skills to align with future-focused soft skill requirements, in the interests of maintaining the currency and vitality of the AQF. In many cases, there will be strong alignment with HE provider Graduate Capabilities, and the treatment of these soft/generic skills within the AQF should allow providers flexibility to align soft skills to both specific learning outcomes and broader capabilities.
- removing the AQF Qualifications Register Policy and reviewing the other three AQF policies in light of recommendations made elsewhere in this submission and to reflect current practice and likely future developments.

**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.**

**Foundation Programs or 'foundation programs' – a crucial distinction**

Section 4.1 of the AQF Review Discussion Paper canvasses the issue of recognising a wider range of credentials in the AQF, with particular reference to 'shorter form credentials' including enabling and foundation courses.

The Discussion Paper consistently uses the term 'foundation' (without capitalisation) in a broad and generic sense. However, it is important to note the existence of specifically designated 'Foundation Programs'. These are regulated under the *Education Services for Overseas Students Act 2000* via the *National Standards for Foundation Programs* (the National Standards), and recognised in the Commonwealth Register of Institutions and

## Courses for Overseas Students (CRICOS).

These Foundation Programs align with the description in section 4.1 in terms of their intent – that is, they are focussed on university admission and the provision of core skills. However, they could not be described as ‘shorter form credentials’. A requirement of the *National Standards* is that these programs must be full-time (20 hours’ study per week or more), with a duration of at least 26 teaching weeks – as long as two standard university semesters, or a similar volume of learning to many AQF levels. (It is also standard practice to offer ‘extended’ Foundation Programs lasting up to 18 months.)

The place of Foundation Programs in the Australian tertiary education ecosystem should not be underestimated. The importance of the international education sector in Australia is well recognised; however, it is less often noted that fewer than 40 per cent of commencing international bachelor degree students entered Australian education directly at that level; of the remainder, around 45 per cent had prior study at non-award level – primarily ELICOS and Foundation Programs (Department of Education and Training, 2015).

The non-award sector *excluding* ELICOS (therefore, primarily Foundation Programs) enrolls around 50,000 international students annually, representing a market that would have otherwise been lost to Australian higher education for want of an appropriate entry pathway (DET 2018 International Student Data Summary).

By comparison, the most recent full-year higher education data indicates 28,500 annual enrolments in enabling programs.

These observations about the size and significance of CRICOS-registered Foundation Programs within the Australian tertiary sector are intended to contextualise their place in relation to the other credential types mentioned in section 4.1 of the discussion paper, such as VET short courses, MOOCs, incomplete qualifications and skills sets. To group Foundation Programs with these other credential types not only fails to do justice to the requirements of the National Standards but also risks undermining their credibility within the international student market and jeopardising a key component of Australia’s international education architecture since the programs were first offered in 1989.

Monash College therefore does not believe that Foundation Programs as defined by the National Standards should be classified as ‘short-term credentials’ or grouped with the other credential types mentioned in section 4.1 of the Discussion Paper.

### **Issues relating to the current non-award status of Foundation Programs**

The above statistics indicate that Foundation Programs are already highly successful despite their lack of recognition within the AQF. However, this is because the majority of Foundation students rely on a packaged offer to an affiliated university, which has guaranteed recognition of the program, despite its non-award status, for entry into its undergraduate courses. While other institutions may also recognise a competitor’s Foundation Program, the recognition process is opaque – and considerably more so if the student wishes to continue study in another country. This unnecessary constraint on student choice seems an example of placing short-term, institutional interests before long-term, sector-wide commitment to more sustainable practices of transparency and customer satisfaction.

There are also problems even for students who continue their pathway through an

Australian university. For example, the medical registration body in Sri Lanka does not recognise medical degrees earned in Australian universities if the graduate entered the degree via a Foundation Program. Cases such as these illustrate the risks of transnational qualification recognition when even a component of the student's educational journey falls outside a national framework. While incorporation within the AQF may not automatically resolve such issues, it would provide a firmer basis on which to build more comprehensive recognition.

Monash College therefore does support incorporating Foundation Programs within the AQF.

### **A place for Foundation Programs in the AQF**

While Monash College does not agree with their inclusion among the 'shorter form credentials' in section 4.1 of the Discussion Paper, Foundation Programs readily align with another qualification under discussion: the Senior Secondary Certificate of Education (SSCE), considered in section 4.4.

As stated in the Preamble of the National Standards, Foundation Programs are intended to 'provide an academic entry pathway to first year undergraduate study or its equivalent'. Standard 1 therefore requires that Foundation Programs must 'include subjects comparable in standard to an Australian Year 12 curriculum' and 'allow evaluation of the equivalence of the course outcomes to those of an Australian Year 12 curriculum', since this curriculum remains the benchmark and cornerstone for admissions into Australian public universities.

Monash College endorses the observation in the Discussion Paper that the SSCE – and, by extension, Foundation Programs – may include knowledge and skills from multiple AQF levels. This lack of alignment with a single AQF level presents significant challenges for the current review.

However, the value of developing an appropriate model for recognising this fact extends far beyond these specific qualifications. As noted in section 4.1 of the Discussion Paper, other international frameworks have already found ways of incorporating qualifications across a number of levels, and this flexibility is likely to become increasingly important in a range of contexts.

It is also noted that the National Standards for Foundation Programs are currently under review. Although these standards sit within the legislative framework for international education, consideration is being given to articulating the role of such programs for domestic students. This could usefully complement activities designed to better articulate the skills and knowledge required for admission to higher education, whether these be obtained via a SSCE, a Foundation Program or other means.

### **Advantages of incorporating Foundation Programs and SSCE into the AQF**

The fundamental advantage of recognition in the AQF for both Foundation Programs and the SSCE is to ensure the strongest possible platform for international recognition of these qualifications. This would not only give greater confidence and clarity to international legislative and regulatory bodies but also align with international approaches in this area: for example, the New Zealand Qualifications Framework and the European Qualifications Framework.

## Other

This submission has emphasised the likelihood and severity of adverse unintended consequences that could arise from inappropriately positioning Foundation Programs within the current discussion. If the issue were to be resolved as suggested above, it is equally important to ensure that incorporation within the AQF does not result in duplication of existing regulatory requirements, which appear to be adequate: that is, state-based policies and regulation for SSCE; and TEQSA's regulation of the Foundation Program Standards.