



# 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

Susan Takao

## Respondent organisation (where relevant)

Curtin University

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

The AQF performs three critical functions within the tertiary education sector: defining relationships between and within the tertiary education environment, establishing a framework for the internationalisation of higher education, and as a framework that supports the regulation and quality assurance of education providers.

Curtin agrees that 'qualifications frameworks are, of necessity, general in nature... and does (sic) not prescribe the content of individual qualifications' (P Noonan, *AQF Review Consultation Questions and Answers*, 2019). While the current AQF is mostly fit for purpose, and aligned with the HESF, Curtin agrees that some of the recommended changes proposed in the Discussion Paper would assist by providing for greater agility within the sector, allowing for innovation reflective of the changing nature of employment, in supporting access and participation in education, and facilitation of life-long learning.

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.

#### **New credentials**

The rise of new credentials, such as Micromasters and other microcredentials, should be considered within the AQF rather than as a parallel system running alongside the framework. It is important that any integration of new credentials within the AQF provides for flexibility. Institutions are currently able to offer microcredentials within the existing AQF language and framework by integrating them within existing accredited courses that are quality assured by the institution. Microcredentials vary in their focus/scope, depth of learning, nature of outcomes, cost, industry relevance and assessment. A common taxonomy and language could help to ensure common descriptors which would enable credit for recognized learning (CRL) and portability.

#### **Enterprise and social skills**

Curtin supports the development of enterprise and social skills as important outcomes for graduates of VET institutions and universities, but would not support the AQF specifying a set of mandatory skills across qualifications. Most universities use statements of Graduate Capabilities that articulate these skills and update these capabilities through benchmarking and community and industry consultation on a regular basis.

#### **AQF taxonomies and levels**

Curtin supports the adoption of an AQF that uses a taxonomy and language inclusive of the VET and Higher Education sectors. The outcomes of learning and their application are very context specific and, while that is often implicit in the AQF, making it explicit will more closely align the AQF with the world of work and support a framework that unifies the tertiary education sector. The European approach of allowing multiple qualification types at the same level has some merit as it more closely reflects the purpose of the AQF and offers greater visibility and recognition of the contributions the VET sector makes to the workforce; however such an approach would need to be adopted across policy, structure and funding of the overall sector to achieve its goals. Revising the application of the knowledge and skills domain of the AQF taxonomy would be a welcome start, as would simplification of descriptors and clarification between levels, particularly at levels 8 and 9.

Curtin also welcomes the differentiation of qualification types within the same level and incorporation of new levels within the AQF that would support enhanced integration of courses /credentials with significant educational outcomes, improve the student experience and cross-institutional mobility. There are standards for ELICOS and Foundations programs which are quite prescriptive and their inclusion in the AQF may address some of the limitations with the standards developed for those courses. There is also significant variation in enabling programs across the sector, and their inclusion in the AQF would benefit students by providing more certainty about their studies and greater mobility across institutions. Curtin also supports the need to reframe the 'hierarchy' to encourage cross-sector education.

#### **Volume of learning**

The concept of volume of learning is a source of confusion as it is open to multiple interpretations. The current volumes of learning appear to be more focused on traditional delivery methods, rather than on learning outcomes. Use of terms such as 'contact hours', 'new learner', 'typical learners' will not improve the situation but will simply add to the confusion. A common credit points system would - in principle - be useful to resolve this and enhance mobility across levels and sectors. The adoption of an optional or national credit point registry would be of value in clarifying, simplifying and unifying the tertiary education sectors. As learning is becoming increasingly disaggregated, with

learners building their skills in more personalised ways such as mixing and matching learning offerings, a shared credit transfer register would be welcome although it may be difficult to administer. A credit point registry would also have the potential to promote mobility by greater alignment with the European and UK higher education systems.

**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 use of credit points, while having merit for further consideration, could potentially be very difficult to administer and would have implications for the HESF. It is important that any changes to volume of learning in the AQF be coordinated with TEQSA. Changes to the volume of learning may also have major implications for the amount of CRL a student can receive as part of their degree.

Changes to programs that are regulated by rigorous accreditation, such as Psychology, Medicine and Nursing, require resourcing (time and fees for changes) and adequate lead-in times to manage the documentation required. Resourcing implications for changes to such clinical courses, and other professional accreditation of courses, need to be considered.

Changes to the AQF should enhance an institution's capacity for innovation while ensuring the quality of the educational experience at all levels.

**Other**