



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. Diane Speed (Dean & CEO) & Prof. Gerard Kelly (Chair, Academic Board)

Respondent organisation (where relevant)

Sydney College of Divinity

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

In terms of the stated objectives, AQF is generally fit for purpose in providing a framework accommodating diversity; supporting consistent outcomes; allowing for easy pathways; supporting individuals' life-long learning goals; underpinning quality assurance; enhancing graduate mobility; and enabling alignment with international QFs.

There seems to be a key tension running through the AQF, between establishing consistency (uniformity) and maintaining diversity. But the AQF would not be fit for purpose if this tension were dissolved.

One of the most urgent issues raised by the Discussion Paper is the need to acknowledge and clarify this tension and maintain more explicitly the distinction between VET and HE.

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.

2.1 AQF is fit for purpose in putting senior secondary, VET, and HE into a single national framework. However, at the tertiary levels, this should not be permitted to blur the fundamental difference of educational framework between VET (competency-based) and HE (critical-reflection-based), which would be to the detriment of both – and to Australian society in the future. The Discussion Paper's reference to 'a more coherent tertiary sector' (pp.6,9,10) is worrying if it hints at obliterating the distinction between VET and HE, which operate on fundamentally different educational philosophies and modes. In the revised AQF, therefore, the objective that the AQF accommodate the diversity of education and training should be strongly maintained by carefully distinguishing VET and HE. In the present AQF this is assisted by having the Qualifications as part of the framework, not just the levels. By including the Qualifications, the 'coherence' is demonstrated by articulating the differences. It would do a great disservice to students and to Australian society to confuse the two as if 'coherence' must be 'sameness'.

2.2 The Discussion Paper's suggestion that the AQF implies 'a status hierarchy' from VET to HE qualifications sounds very much like a politically correct ideology at work, rather than strictly educational concerns. By its very nature, the AQF should describe, on a number of axes, outcomes along the range 'simple' to 'complex'. This will automatically generate a hierarchy of learning (not status). The VET competency-based approach is more suited for the simpler skills-oriented outcomes, and HE for the more complex outcomes requiring critical-reflective thought, well informed by leading-edge theory and practice. Rather than blurring the two, a future revision of the AQF should clarify the differences that make them educationally distinct. With the fundamental differences between VET and HE clarified, there could then be further revisions to the various descriptions of the AQF Levels and Qualifications.

2.3 Similarly, although the AQF levels assist individuals to progress through education, the diversity that exists amongst awards at the same level ought to be clearly recognised, maintained and promoted. This is especially required at Level 9, where greater transparency in the essential differences between Master's degrees (eg. a Master's totally by research, compared with a Master's with a minimal research component) will assist students in selecting a course most suitable to their own needs and desired outcomes. To lose sight of this diversity of awards within the same level would disadvantage students. At present, this is assisted by having the three Master's degrees distinguished (Research; Coursework; Extended). To retain Qualifications in the AQF also provides transparency in the recognition that VET qualifications are not the same as HE qualifications. To illustrate the need for careful distinction: where Master's students with different backgrounds in the discipline are in the same classroom, the typical outcome is a slowing down and simplifying of teaching to accommodate those with little background and this disadvantages those with more substantial background. A further illustration would be the Level 8 awards where an Honours degree (principally research) is regarded as equivalent to a Graduate Certificate, which for most students would be an initial course of study in the discipline.

2.4 For AQF 9 and 10 greater clarity of discourse may help to maintain the appropriate diversity within each level. Two different discourses already well-established in HE may both have a place in assisting the clarification of the qualitative differences in awards: the distinction between 'research' and 'scholarship'; and the distinction between 'pure' and 'applied'. The relative weight placed on either end of these two spectra may be utilised in determining the nature of a particular award, and further distinguish between awards at the same level. This raises questions about the nature of different doctorates. One issue concerns doctorates named for their disciplines. Some

have existed from long before the advent of the PhD and within the discipline are at least equal to the PhD in scholarly standard, whereas others are truly professional degrees with substantial coursework. The AQF at present blurs this distinction, so that a traditional Doctor of Theology or Doctor of Letters is not distinguished from, say, a Doctor of Education. The revision should make clear that some other doctorates may belong with the PhD whereas others do not.

2.5 Although the AQF facilitates progress through education and assists people to move between different educational sectors, it also needs to recognise that some pathways will create what might be called 'generalists' and others will create 'experts'. Although there are generic skills learned at each level, the acquisition of the knowledge inherent to a particular discipline-area is still a necessary part of an education, and those who progress from an undergraduate degree to a postgraduate degree in the same discipline will develop a higher expertise in that discipline than someone whose pathway includes transferring from one discipline to another. In the interests of the production of genuine research at the higher levels and beyond, the 'expert' pathways need to be clearly articulated, recognised and promoted. This also necessitates the acknowledgement of diversity within levels, and between VET and HE (as above).

The attempt of the present AQF to deal with discipline/sector-independent knowledge/skills etc, can create the impression that discipline/sector-dependent knowledge/skills etc are not at all significant. It can also privilege skills over knowledge. Advice based upon this misguided impression has the potential to disadvantage the student who seeks to gain expertise in a particular discipline/sector.

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.

Comments in relation to the five areas highlighted by the December 2018 Discussion Paper:

1. The inclusion of micro-credentials within the AQF

To introduce other credentials into a Quality framework is a good idea, but as the Discussion Paper shows, there are a variety of ways that this could occur, without making them a part of the AQF itself. It seems that their introduction would unnecessarily complicate the AQF and it is difficult to see where limits could be drawn. Guidelines to Quality control could be developed that enabled proper assessment of equivalence etc., e.g. volume of learning, credentialing institution, etc.

Rather than elaborately including such micro-credentialling within the AQF, further guidelines could then be given in regard to the application of credit and prior-learning, in order to recognise that properly quality-assessed micro-credentials may be considered as part of the determination. The 'shared credit transfer' register (p.32), which is a good idea for students, could also be associated with this credentialing and so useful for institutions.

2. The clarification of enterprise and social skills

Given the variety of items included in this category, and their context-specific nature, it does not seem wise to further single these out for attention in the AQF. Rather it seems best to specify that the enterprise and social skills of relevance to the award ought to be taught, acquired, and assessed as part of the normal learning & teaching for the particular award.

3. The clarification of AQF taxonomies in relation to levels and qualifications.

The use of a hierarchy of levels with some descriptors duplicated in regard to both levels and qualification types need not be deemed to be confusing, even if some have apparently found it so (p.21). Such consistency, in fact, helpfully demonstrates how different qualifications (e.g. VET and HE) can cohere in a corresponding level without being the same. The suggested 'no duplication' approach (p.21) should be rejected as it assumes that the knowledge, skills, and application of both, is the same for every qualification at the same AQF Level, thus blurring the distinction between VET and HE that ought to be maintained. We strongly urge that the present method is maintained. Transparency about the differences between Qualifications within the same level becomes even more essential at the upper levels. So, for example, if the learning outcomes of an award are largely competency based (as in VET), then this should prevent that award from being named as if it were a HE award (e.g. GradCert).

4. The place of Senior Secondary Certificates of Education in the AQF.
This is something that would be good to see developed and, in our sector, we have had specific inquiries about how to create concrete pathways from senior secondary to, say, AQF 5 offerings.
5. Changes of approach to Volume of Learning
Guidelines concerning volume of learning remain crucial to allow the comparability of levels/awards that is essential to achieve the objectives of the AQF. Yet again, the Discussion Paper (p.27) shows that the 'in principle' critique of the presence of V.o.L in the AQF is driven by the VET sector competency-based approach, rather than the HE commitment to Critical Reflection, which arguably requires appropriate time to be devoted in order to achieve the requisite breadth and depth of knowledge, not simply the acquisition of a skill. Similarly, the learner- or employer-driven desire for shorter/est courses (p.29) is not a purely educational rationale.
In opposition to the pressure to remove the VoL from the AQF, we would argue that it should be seen as a necessary part of the AQF and integral to the objectives of the AQF. However, given a great variety of practice in temporal delivery of courses (semesters, trimesters, summer terms), it seems sensible to move towards a carefully defined credit point system (taken up by VET as well), which includes a time-factor, but may also include other criteria. Once the decision is made to retain VoL as an AQF essential, the suggestion that more guidance be provided is thoroughly sensible.

Other

1. The material compiled in Section 3 of the discussion paper ought to be recognized as generalisations that may or may not apply to particular 'industries' in a variable fashion. Statements such as 'employers prefer ...' fall amongst those that have been recognized as 'weasle words' and have very little value in terms of getting at the actual facts for any given profession. The value of such generalisations for producing an educational instrument like the AQF must remain questionable.