



NCSEHE

National Centre for Student
Equity in Higher Education



Curtin University

Submission to the Review of the Australian Qualifications Framework

NCSEHE

2019

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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

Professor Sue Trinidad

Respondent organisation (where relevant)

National Centre for Student Equity in Higher Education

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

The NCSEHE endorses the recommended changes that will allow for the AQF to be fit for purpose. Six recommendations are discussed in the 'Other' section.

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.

These six key recommendations need to be made a priority as outlined in the 'Other' section

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.

Whatever implementations arise from any of these proposed changes there is a need to consider the impact on equity students.

Our response is outlined in the 'Other' section (see next page).

Other (see below)

About the National Centre for Student Equity in Higher Education

The National Centre for Student Equity in Higher Education (NCSEHE) began operation in 2008, hosted by the University of South Australia. In May 2013, Curtin University won the bid to take over the Centre and received funding to achieve its aim of informing public policy design and implementation and institutional practice, to improve higher education participation and success for marginalised and disadvantaged people.

The NCSEHE's key purpose is "to inform public policy design and implementation, and institutional practice, to improve higher education participation and success for marginalised and disadvantaged people."

In keeping with its purpose, the NCSEHE is connecting Commonwealth student equity policy with the activities of higher education institutions and national equity outcomes through its input into comparative assessment of institutional strategies, systemic assessments of policy achievements and assessments of national policy-making in view of this evidence.

The Centre's focus is based on three programs of research activity:

1. Equity Policy and Program Evaluation
2. Equity Policy and Planning Research
3. Student Equity Data.

Introduction

In addressing the *Review of the Australian Qualifications Framework* discussion paper (Noonan, 2018), the NCSEHE focussed on ensuring that principles from the **Equity 2030 vision: The Best Chance for All** are considered. The Equity 2030 consultation process involved 10 major workshops across Australia, attended by over 150 experts in the field of equity in higher education, who collectively produced a vision for higher education in Australia that gave every student the best chance of success, and in doing so, aims to create the optimum educational outcomes for Australia as a whole. The workshops were held in 2018 and the report, **The Best Chance For All** was published in February 2019.

Advancing Australia's future depends on all its people, whoever and wherever they are, being enabled to successfully engage in beneficial and lifelong learning.

- **Contributing to:** A fair, democratic, prosperous, and enterprising nation; reconciliation with Indigenous Australia; and cultural, civic and intellectual life.
- **Achieved by:** An inclusively designed system with multiple entry and exit points; proactive removal of barriers to participation; and tailored support where needed.
- **Accountable through:** An integrated approach to measuring success at institutional and national levels to align performance with policy objectives.

Given that around 50% of domestic undergraduates can be classified into at least one equity category, the AQF is particularly well suited to provide clear expectations of transitional pathways to all stakeholders for life-long learning.

The NCSEHE commends the AQF review Panel for their work on updating and adjusting the Framework so that it is relevant for life-learners, that is, people who will come in and out of study over their life time. The NCSEHE welcomes the opportunity to comment on the Discussion Paper on the Australian Qualifications Framework (AQF).

The Discussion Paper, combined with the supporting Australia wide series of seminars, gave a full and fair hearing of the many and complex issues in contributing to the evolution and necessary updating of the AQF.

The progressive development of the AQF is of fundamental importance because it comprises numerous building blocks that create the foundation of a good education system. Getting these fundamentals right is critical for effectively managing the rapid changes occurring in work, education and training.

From a NCSEHE perspective we propose another fundamental proposition – that developing an equitable, inclusively designed system, with multiple entry and exit points, combined with tailored support for students from disadvantaged backgrounds, will not only meet the needs of all current students, but it will also produce the best educational outcomes for Australia as a whole. The NCSEHE commends the AQF Panel for their thorough review, which is generally consistent with the perspective taken by the NCSEHE. We support the draft recommendations, which we hope may be further informed by some of the points we have made in our submission.

Areas of Possible Change

Shorter Form Credentials

Inclusion of shorter form or sub-credentials in the AQF presents a significant opportunity for developing the Framework to reflect the fluidity with which students engage in formal education structures, where we need more flexibility in education courses and teaching. Providing avenues for educational institutions to provide qualification types within or between current levels could encourage innovative delivery of critical knowledge and skills that is more responsive to the rapidly evolving relationship between work, education, and training.

The discussion paper identifies multiple examples of innovative content delivery courses which do not currently have any definitive classification in the AQF. The NCSEHE endorses ensuring flexibility within the existing AQF structures to allow for greater consistency in the development of short courses, for student and industry transparency, and to ensure equitable outcomes for all students.

Evidence on the efficacy of sub-credential and short course outcomes is scarce. However, this may be due to the lack of consistency in non-AQF credentials across various institutions (Pitman et al., 2015). There are a number of forms of short-form courses which have been developed within the student equity sector, commonly referred to as 'enabling programs', which have shown to be effective pathways into higher education degrees (Level 7 and above) particularly for students from low socioeconomic backgrounds (Habel, Whitman, & Stokes, 2016; Pitman et al., 2015; Vernon, Watson, Moore, & Seddon, 2018).

However, difficulties arise when formalising short courses. For example, the 2017 *Higher Education Reform Package* (Department of Education and Training, 2017) included proposals to formalise enabling programs as qualifications for tertiary admittance. However, this may have altered the course-fee structure which has the potential to narrow the opportunities for all to successfully engage in beneficial and lifelong learning.

Despite this, development of flexible sub-levels within the existing AQF taxonomy could be an effective means of including short-form credentials and ensuring the AQF remains fit for purpose in this regard. As it stands, there is a need to provide clarity in articulating the distinctions between various levels of the AQF, and at present, there are multiple examples of one level containing multiple qualification types that are not directly

comparable. This will be discussed further in the section entitled *The AQF Taxonomy and Levels*.

Recommendation 1: The Review considers the means by which shorter form credentials can be included in the AQF.

Enterprise and Social Skills

As noted in the discussion paper, the inclusion of enterprise and social skills in a potential redevelopment of the AQF is problematic particularly considering the position of many equity students where they are challenged and need additional support. Formalising enterprise and social skills in the AQF would require these skills to be taught and/or assessed within the context of equity groups, as well as in the context-dependent nature of various enterprise and social skills across equivalent degrees. This would require a significant shift in the complexity of the AQF taxonomy to achieve such detailed inclusion of these various skills.

The NCSEHE agrees with the approach as outlined in the discussion paper, noting that these enterprise and social skills should not be included in the current taxonomy of the AQF as requirements for certification. Therefore the matter of teaching enterprise and social skills is not recommended at this stage but that the issue is taken up separately in ongoing dialogue between the AQF and other stakeholders.

Recommendation 2: That enterprise and social skills not be included in the taxonomy of the AQF.

The AQF Taxonomy and Levels

The AQF is particularly well suited to provide clear expectations to stakeholders of the suitability of educational pathways and transitions through associated entities such as Tertiary Education Quality and Standards Agency (TEQSA) and the Higher Education Standards Framework. As a hierarchically structured framework, each level has the potential to signal clearly to those considering various qualifications to assess whether they have the requisite level of prior achievement, and the comparable value of each qualification.

Though the AQF provides some guidance in the development of pathways for transition between various levels of qualifications (Pitman et al., 2015), in its current state, the framework does not provide effective articulation of the substantive difference between levels. As identified in the discussion paper, there is unnecessary duplication of level descriptors along with the articulation of knowledge and skill requirements at each level,

without the AQF providing examples of equivalent qualifications, it is unclear how one is of a higher level than the other.

Additionally, there are cases where the taxonomy appears to include detail between levels which contradicts the hierarchical positioning of the qualifications at these levels. For instance, skills and capabilities required of a Level 5 or 6 qualification highlight an emphasis on autonomous operation and supervisory capabilities, compared to a role occupied by Level 7 graduate, which typically entails far lower levels of autonomy and responsibility over others.

As stated above in the section on shorter form credentials, amendments to the existing presentation of the AQF level structure may be necessary in order to distinguish between non-comparable qualifications at the same level. Multiple levels (namely Levels 6, 8, and 9) within the AQF *qualification type learning outcomes descriptors* table (Australian Qualifications Framework Council, 2013) contain examples of degree qualifications of various complexity, but with no indication of how to differentiate whether one is of a higher order qualification than another.

It is suggested by the review panel that a means of addressing the inclusion of short courses could be to develop the AQF 'horizontally', allowing for qualification types within each level to differentiate based on the length and complexity of the courses at lower levels. This could potentially be a means of mitigating the current, or potential, misalignment of qualifications at higher levels as well, including Masters by Research and Masters by Coursework degrees, which place greater emphasis on knowledge, skills, or applications.

Recommendation 3: That the AQF be redeveloped to allow for different qualification types within a given level.

Senior Secondary School Certificates

The evolution of the Australian senior secondary school certificates of education (SSCE) as a qualification throughout Australia has presented challenges to the progressive structure of the AQF. Various developments in VET provision for non-ATAR directed secondary study have resulted in a mismatch in the path of progression through AQF levels, depending on the educational pathway of a student. This has also resulted in concerns that the SSCE in various states and territories is potentially accredited with an inaccurate representation of the skills and learning outcomes achieved by a student, dependent on their course selection in school.

Evidence from other jurisdictions suggests that despite the wide variety of outcomes inherent in the SSCE, a framework such as the AQF is still fit for accrediting the level of a secondary school qualification. As mentioned by the panel, other countries assign secondary school accreditation to multiple levels of a framework, with the level of accreditation based on the specifics of the student's pathway. This level of flexibility would be complementary to other potential changes mentioned in earlier areas of focus, and would also complement a shift in focus for volume of learning outlined in the following section.

There is the need to, instead of perpetuating and accommodating differences in the SSCE, why not propose that the Council of Australian Governments (COAG) process investigate the harmonization of the SSSC across States given the need for the States to align secondary school qualifications?

Recommendation 4: That the treatment of secondary school qualifications in the AQF be amended to reflect the greater diversity of offerings at a broad range of AQF levels with the endorsement of COAG.

Volume of Learning and Credit Points

Volume of learning as outlined in the current AQF is potentially outdated given the evolution of tertiary education over the years since its initial development. While an approximate representation of the 'amount of time required' in at a given accreditation level is a useful benchmark to differentiate between qualification levels, there is potential for it to be less relevant in today's education landscape.

However, with some of the adjustments suggested by the Review, volume of learning could remain relevant in the AQF. The suggested amendments of years to hours would be a particularly useful change, as this would improve transparency for those studying part-time or sporadically due to other commitments. Students from equity backgrounds would benefit from this amendment, given that many equity students often juggle study, work, family and money issues to a greater extent than non-equity students. The shift to recommended time for a 'new learner' rather than a 'typical learner' would also be a significant shift toward more inclusionary descriptors of volume of learning, as it would remove any ambiguity as to what the norm a 'typical learner' is referring to.

As mentioned, credit points are an important aspect of transferability of learning between higher education institutions but are not particularly useful outside the context of applying recognition of prior learning to transferring students. Formal inclusion as a measure of

volume of learning may not be a particularly useful change, as it may precipitate a 'race to the bottom' amongst institutions, which would negatively impact student equity.

Recommendation 5: That the volume of learning measure be adjusted to reflect 'hours' rather than 'years' and that this measure be described for a 'new' learner.

Recommendation 6: That the hours-based credit points included as a measure of volume of learning.

Recommendations

The NCSEHE commends the AQF Panel for their thorough review, which is generally consistent with the perspective taken by the NCSEHE with these recommendations in relation to changes to the Australian Qualifications Framework as summarised as follows:

The NCSEHE endorses the recommended changes that will allow for the AQF to be fit for purpose. These key recommendations need to be made a priority. Whatever implementations arise from any of these proposed changes there is a need to consider the impact on equity students.

Recommendation 1: That the Review considers the means by which shorter form credentials can be included in the AQF.

Recommendation 2: That enterprise and social skills not be included in the taxonomy of the AQF.

Recommendation 3: That the AQF be redeveloped to allow for different qualification types within a given level.

Recommendation 4: That the treatment of secondary school qualifications in the AQF be amended to reflect the greater diversity of offerings at a broad range of AQF levels with the endorsement of COAG.

Recommendation 5: That the volume of learning measure be adjusted to reflect 'hours' rather than 'years' and that this measure be described for a 'new' learner.

Recommendation 6: That the hours-based credit points included as a measure of volume of learning.