



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

Dr Shanny Dyer

Respondent organisation (where relevant)

ARCS Australia Ltd

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

See attached

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.

See attached

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.

See attached

Other



15 March 2019

The Panel Chair
Mr Peter Noonan
Australian Qualifications Framework Review Panel

Expert review of the Australian Qualifications Framework (AQF)

ARCS Australia Ltd (ARCS) welcomes the opportunity to provide a submission to the Expert Panel reviewing the Australian Qualifications Framework. We note that concurrent with this review, Prime Minister and Cabinet have released a review of the Vocational Education and Training (VET) Framework in December 2018. In providing this submission, we believe these reviews to be highly interrelated and that the submissions and outcomes should be considered in parallel.

We have provided information about our organisation in order to explain why we are interested in and feel we can comment on the AQF. The information provided presents our response to the terms of reference, and the way we have contributed to the education of our sector.

ARCS background

ARCS is a national, membership-based organisation focused on the development and growth of the healthcare sector education on by development of innovative drugs, diagnostics and therapies. ARCS has provided education, career pathways, professional development, networking opportunities and advocacy for the sector for over 35 years.

ARCS is an education affiliate of MTP Connect, the federally funded growth centre for the MedTech, Biotech and Pharmaceutical sectors. This affiliation acknowledges our unique role in providing education to the sector.

Our membership is made up of individuals working in clinical research, regulatory affairs, health economics, medical information and other disciplines related to the development and quality use of therapeutic goods. ARCS members are based in industry, academia, medical research institutes, government, hospitals and patient groups.

Through its members ARCS has a broad and effective reach throughout the healthcare sector, and provides a neutral forum to develop, agree and implement aligned policies and initiatives.

ARCS and its members are dedicated to improving the quality of life of healthcare consumers.

A large proportion of our members have a focus on clinical research and regulatory affairs that is the backbone of bringing innovative therapies to market. ARCS has played a key role in ensuring that members of this group have the appropriate training to enable them to undertake their roles in an ever-changing landscape. Without these trained personnel, Australia would not be in the

unenviable position it is today in relation to clinical research and the clinical trials that are performed.

The importance of the clinical research sector

Clinical research¹ is a sector of healthcare science that determines the safety and effectiveness (efficacy) of therapeutic goods intended for human use in the prevention, treatment, diagnosis or for relieving symptoms of a disease. Clinical research is conducted through a very highly regulated and controlled set of systems that comply with both national and international standards.

In addition to the clinical benefits of research it also plays an important role as a contributor to the economy either directly or through job creation. MTP Connect reported² in 2017 that clinical trials contributed \$1.4B to the Australian GDP and employed a highly skilled workforce of over 6,000 people. This study showed that within 10 years the sector could double providing \$3.4B and over 14,000 jobs.

To enable this growth, ARCS has been proactive in its education and training programs, providing the necessary accreditation and informed the sector on new and updated legislation, policy changes, guidance updates and international changes to regulations.

Growing the Sector through training and education - CRITERIA Case Study³

In order to achieve the projected growth in clinical research, the sector needs to address the current shortage of skilled experience in the workforce⁴ which is identified as one of the main barriers to growth. Currently this shortage is met by filling positions with overseas trained staff using the 457 and related visas⁵. Whilst these visa schemes have somewhat assisted in closing the shortfall, appropriate training of qualified local students would greatly benefit the sector in Australia.

Consequently, the CRITERIA program was designed to specifically address the skills shortage currently constraining growth of the Australian MTP sector, particularly in the area clinical trials. The program, led by ARCS, and funded by MTP Connect in conjunction with 14 industry consortium members, delivers industry-led education and mentoring for university students or junior practitioners wanting to enter the clinical research sector. Output of the program is appropriately trained graduates equipped with the skills necessary to enter full-time employment within the clinical research sector. The CRITERIA Program is an example of mixed face to face and online micro-credentialing to enable tertiary trained individuals to upskill with specific skills and knowledge that would make them job ready.

To date, uptake of graduates from the program by MTP industry organisations has surpassed the original project objectives and milestones.

¹ https://en.wikipedia.org/wiki/clinical_research

² MTP Connect_LEK Consulting (2017) Clinical Trials in Australia. The economic profile and competitive advantage of the sector

³ ARCS CRITERIA Program <https://www.arcs.com.au/partnerships/criteria-program>

⁴ Melissa Fassbender, 24-Oct 2018, Out-sourcing Pharma.com

⁵ The Temporary Work (Skilled) visa (subclass 457) was closed to new applicants 18 Apr 2018

Global standards for clinical research

As clinical research is a global industry, clinical trials in Australia need to meet international standards to ensure consistency within global multi-centre trials. ARCS Australia provides this essential, regularly updated information through its short courses⁶ as a valuable service to the sector.

Role of education providers

ARCS Australia has been providing professional education to the clinical research sector for over 35 years. It achieves this through the development **of industry led, case study driven** short courses, delivered as workshops, seminars and online learning. These courses are mainly run for highly skilled participants with an AQF (Level 7) pre-qualification⁷ who are interested in working in or transitioning into the clinical research sector.

Links with the University sector

ARCS works closely with the university sector at the post graduate level in translational research (bench to bedside model). ARCS provides up to date, industry specific content that supplements the knowledge provided by the university course program. It provides students a practical and applied understanding of the regulations, guidelines and standards for conducting clinical trials as well as the regulatory framework in Australia.

Examples of this collaborative approach is the provision of short courses to Oby ARCS. The short courses provide industry led content that contributes to the students' overall credit points. ARCS delivers these components as it is not feasible for university staff to cover these industry case study based materials.

TERMS OF REFERENCE

Whilst ARCS appreciates the depth of the questions in this consultation, we have only commented on those aspects we feel we have sufficient knowhow to address.

Term of Reference 3., Part iv

AGILE workers: As stated in the Future Skills⁸ report commissioned by Google, advances in technologies and automation will drive dramatic shifts in Australia's education and training requirements. It talks to a 33% increase in education and training across a worker's lifetime as they will require new skills to adjust to changing work. It also proposes a 12-level education scheme rather than the current 10 to accommodate a broader framework that would include school, TAFE, higher education, professional development and on the job training. This report is

⁶ ARCS workshops, seminars, online accreditation courses. <https://www.arcs.com.au/>

⁷ Such as nurses, pharmacists, medical researchers, scientists, engineers, statisticians, clinicians

⁸ https://www.google.com/search?q=future+skills+report+alphabet&rlz=1C1GCEU_enAU820AU820&oq=future+skills+re&aqs=chrome.2.69j57j0l5.5599j0j8&sourceid=chrome&ie=UTF-8

further supported by the Federal Government's report Australia's Tech Future⁹ recognising the economic and social opportunities in the digital economy.

On the move: Populations are today highly mobile both in physical and in job locations. Employees today and in the future are more likely to change jobs 2.4 times more over the next two decades¹⁰.

Internationally: It will be imperative for the Australian education system to be streamlined and to provide the flexibility required to meet ongoing needs. The higher education sector has relied heavily on international students. Unless we adapt quickly, we will not be a country of choice for international students. Business as well will require an agile training framework to compete internationally for the best employees.

EdTech: In its most recent analysis of the industry, Frost & Sullivan found that the Australian Edtech market is expected to grow to A\$1.7 billion by 2022. The market is expected to grow significantly amidst increasing student demand for education services and technology innovation, competition amongst institutions and decreasing acquisition costs.¹³

It is imperative that we embrace a new way for education to be delivered. This means that the way people access information and learn is changing dramatically.

EdTech tools and apps will be integrated into the curriculum for everything from improving delivery to tracking students' progress and more¹¹.

Just these changes alone, will change the face of education and the demands for accredited and recognised qualifications. To enable a rapidly changing environment, good governance over the education systems is imperative.

Term of Reference 3., Part iv

A single governance framework to support educational offerings in Australia

A single and integrated education system would be a first step towards ensuring a clear, appropriate and unambiguous ranking of accreditation and qualifications. A single, overarching governance framework is necessary to ensure consistency of approach and alignment of objectives. It would bolster the TAFE program if it were seen in relation to higher education standards. This would potentially encourage students to see their TAFE course as part of a continuum of learning in Australia. We have seen the issues in the TAFE system as underregulated private providers diminish the quality of the education offered. This is a strong disincentive for those who have chosen this education path. If TAFE and the private providers were under the same governance structure, this would be better governed and managed.

⁹https://www.google.com/search?q=australias+tech+future&rlz=1C1GCEU_enAU820AU820&oq=australias+tech+future&aqs=chrome..69i57j0l3.5176j0j7&sourceid=chrome&ie=UTF-8

¹⁰https://www.google.com/search?q=australias+tech+future&rlz=1C1GCEU_enAU820AU820&oq=australias+tech+future&aqs=chrome..69i57j0l3.5176j0j7&sourceid=chrome&ie=UTF-8

¹¹ <https://elearningindustry.com/benefits-technology-integration-education-sphere>

A single governance framework would also ensure that terminology across VET, HE and other education providers can be agreed and harmonised.

Importantly, the AQF should maintain international alignment and recognised standards. A single governance framework would make the implementation of this more streamlined.

A unified AQF system would ensure that all education offered in Australia is acceptable to global companies, employees and students.

Term of Reference 3., Part v

Continuing Professional Development

Many industry sectors currently require their employees to undertake a minimum education program to ensure they have relevant and current knowledge and skills. This is a well-recognised and globally accepted system for building and maintaining competency in the workforce. Therefore, the concept of a volume-based learning system (hours of learning) makes sense under the proposed structure.

In our sector, like many others, employees are often required to undertake Continuing Professional Development (CPD)¹² to maintain their ability to practise. It is an effective and productive form of education where the CPD points are obtained from recognised professional bodies. Conceptually, CPD points are gained from hours of active learning (1 hour = 1 CPD for example).

Industry also differentiates passive versus active learning. In simple terms, active learning assesses the students understanding of the material through a test process whereas passive learning does not. Greater credence is placed on active learning.

RECOMMENDATIONS

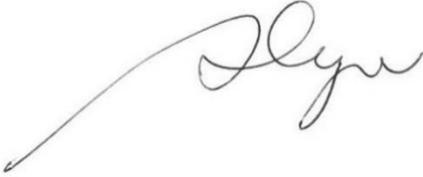
ARCS Australia suggest that the Panel considers:

1. That a single governance framework for all educational offerings in Australia be implemented through the AQF that includes TAFE courses and industry based, accredited private providers.
2. That an appropriately skilled group be established to monitor, review and maintain standards within the framework.
3. That this single governance framework ensures international alignment and consistency.
4. That the concept of passive versus active learning is considered when developing the credit point system.
5. That changes to the AQF to include other forms of qualifications are mitigated through changes to the structure and language of the AQF.
6. That a system of modularisation of learning including flexibility in measuring learning be included in the AQF to allow for micro-credentialing.

¹² https://en.wikipedia.org/wiki/Professional_development

ARCS would like to thank the Expert Panel and the Department for the opportunity to contribute to the AQF review. We would be pleased to provide the panel with further information and welcome the outcomes of the review.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Shanny L Dyer', with a long, sweeping underline that extends to the left.

Shanny L Dyer PhD GAICD
Chief Executive Officer
ARCS Australia Ltd

A handwritten signature in black ink, appearing to read 'George Papadopoulos', with a stylized, horizontal flourish at the end.

George Papadopoulos
President and Chair of Board
ARCS Australia Ltd