



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 Helen Bartlett, Vice-Chancellor and President

Respondent organisation (where relevant)

Federation University Australia

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

Federation University Australia welcomes the opportunity to provide this written submission and would like to congratulate the panel on its work to date and in framing the proposals outlined in the discussion paper released in December 2018.

Firstly, we would like to respond to the panel's broad question as to whether the AQF is fit for purpose and where it is not fit for purpose, what reforms should be made to the AQF and what are the most urgent priorities? The university believes the Australia Qualifications Framework plays an important role by providing a basis of comparison of qualification types and in support of student mobility. As a broad tool the AQF serves this purpose well but, as the panel has identified, there are a number of areas in which it could be further enhanced and the University welcomes this most recent review.

As a dual sector institution Federation University also particularly welcomes and supports the panel's observations that the current framework could be enhanced to better integrate Vocational

Education and Training and Higher Education qualifications and to reflect the application of knowledge and skills.

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 relation to the specific areas of possible change identified and approaches outlined in the discussion paper the university would like to make the following comments and further recommendations.

1. Short form credentials

As noted in the discussion paper, the umbrella of short form courses covers a range of activities from formal pathways, to regulated shorter form credentials, specialised enabling programs, micro-credentials and skills development.

The University agrees that some short form credentials could be included in the AQF but this would need to be on the basis of their learning outcomes and would recommend that staged/multiple exit points and incomplete qualifications should be dealt with separately from enabling and foundation courses and MOOCS.

2. Treatment of enterprise and social skills

The University agrees with the panel that generic skills need to be viewed in context and not in of themselves. Consistent with tertiary sector practice we also note that these skills are broadly addressed through our statements of graduate attributes and course content aligned to the development of those attributes at levels appropriate to the qualification.

3. Taxonomies and levels

The University supports the panel's proposal to remove the description of knowledge, skills and application from the qualification types, provide a description of qualification types that is linked to levels, and revise the descriptors to simplify them and ensure clear distinctions between levels.

The University acknowledges the potential anomaly that exists with Graduate Certificates and Graduate Diplomas at AQF level 8 having both vocational and higher education expressions. The University's view would be that these forms of post-graduate qualifications are not suitable to be taught in the VET sector and should be restricted to Higher Education. VET sector providers are not generally equipped in terms of staffing to deliver post-graduate qualifications and should not deliver qualifications beyond AQF 7.

4. Senior secondary school certificates

The University agrees with the panel that SSSCs do not readily within a single AQF level but would benefit from a clearer articulation in the descriptor to recognise the knowledge and skills acquired in the SSCE can be at a broad range of AQF levels and result in multiple pathways.

5. Volume of learning

a. Measure of volumes and learner group context

The University supports the panel's statement regarding the problematic nature of the current year based volume of learning statements and their lack of account for non-traditional modes of learning such as blended and online, or the differences in student cohorts, their level of experience and capacity for self-directed learning.

Whilst the notion of moving to an hours based volume of learning linked to the needs of a new learner cohort has some appeal, the University shares the panel's reservations around the complexities of structured versus unstructured learning and how variations between disciplines could be distilled to a single framework.

The University recommends to the panel that the AQF's focus should be on learning outcomes, particularly as lifelong learning becomes the norm and the blending of work and study becomes a more prevalent pattern.

b. Credit points and pathways

The University does not believe developing a shared credit transfer register is aligned to the core purpose of the AQF. Further decision on credit need to be linked to demonstrated alignment to the learning outcomes of particular courses which are best managed through institutional admissions and Tertiary Admissions Centres.

It is also worthy of note that credit pathways in the AQF are unidirectional from VET to Higher Education. In fact, as many, if not more, students' progress from higher to lower levels of the AQF it would be worth considering how reverse credit arrangements might be addressed that would facilitate those with a higher level AQF qualifications gaining credit or advanced standing into lower level qualifications.

Policies

In relation to the question of the AQF Qualifications Issuance Policy the University supports that review panel's contention that issuance is adequately dealt with in the Standards for RTOS and HESF. We would further highlight that the policy appears out of step with the move to digital certification and if retained would benefit from revision and alignment to these methods of release and fraud mitigation.

The University also supports the panel's recommendation to remove the AQF Qualifications Register Policy, but to retain the AQF Qualification Type Additions and Removal Policy.

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.

Volume of learning and credit pathways in particular would require more extensive consultation and development.

Other