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Professor Peter Noonan
Chair, Australian Qualifications Framework Review Panel
c/- Department of Education and Training
GPO Box 9880
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Via email: AQFReview@education.gov.au

Dear Professor Noonan

I am writing on behalf of the Group of Eight (Go8) in response to the Government's Discussion Paper on the *Review of the Australian Qualifications Framework (AQF)* that was issued in late 2018.

As you would expect, the Go8 is closely engaged on issues relating to the quality, reputation and standards of Australian higher education and the Australian post-secondary education system more broadly. It is in that context that the Go8 views the AQF as a core element of the overall quality assurance and regulatory architecture that underpins Australia's hard-won reputation for quality educational delivery.

Please note that Go8 member universities may each make their own, more detailed contributions to this Review.

In summary, the Go8 recommends and notes the following:

- **Any change to the AQF must be examined alongside outcomes from the Review of the Provider Category Standards and through a lens that thoroughly considers funding implications for post-secondary education;**
- **The current AQF is overly detailed and prescriptive and should be simplified;**
- **Any revision of the AQF must take into account cost and funding implications for institutions;**
- **A revised AQF should incorporate certain short-form credentials while other short-form courses should remain outside the scope of the AQF;**
- **The Senior Secondary qualification should be revisited, noting it is most critical that any proposals be considered through a lens of encouraging students to compete schooling with a full range of future options remaining open to them for their future;**
- **It is imperative that the AQF be aligned to international frameworks;**
- **The temptation to incorporate separate enterprise and social skills within the AQF levels should be resisted; and**
- **The concept of a national credit transfer register is premature and should not be considered in the absence of a national view of post-secondary education quality assurance and regulation.**



Context – Performance of the Go8

As Australia's leading research-intensive universities, the Go8 are significant net contributors to the Australian economy: **in 2016 the Go8 generated a total economic impact of \$66.4 billion to the Australian economy¹.**

The most significant component of this total impact comes from the impact of research activities of Go8 universities: over \$24.5 billion in 2016.

Education activities at Go8 universities are also very substantial. **Each year Go8 universities deliver over 100,000 graduates to Australia.** These include **more than 55% of Australia's science graduates, more than 40% of engineering graduates and the Go8 also awards more than half of all research doctorates in Australia.**

Broadly, Go8 universities have more than 380,000 students including more than one-third of all post-graduate students in the sector.

Ensuring a strong and robust qualifications framework in this context and internationally, is critical for the Go8.

AQF viewed as part of the broader post-secondary framework

The AQF is first a regulatory tool and a key component in a broader regulatory system for senior secondary and post-secondary education in Australia and so any proposed amendments to it should be considered in that context.

The regulatory and quality assurance framework is a central reason for the robust growth of Australia's international education industry, leading to Australia being one of the leading destination countries for overseas students.

The Go8 notes there is yet to be a full and comprehensive review of the post-secondary education regulatory and quality assurance architecture. Whilst the current reviews of the AQF and Provider Category Standards are aligned, they are being undertaken in the absence of an overarching strategy and direction. That leads to the **broader questions for the sector and community of whether there is a goal, an outcome or a vision linked to these reviews.**

The Go8 expressed these sentiments also in the context of the Government's review of the Provider Category Standards, being undertaken by Emeritus Professor Peter Coaldrake AO. It is pleasing that you and Professor Coaldrake have been in discussion on the conduct and themes emerging from the reviews of the AQF and the Category Standards. The Go8 has been clear: **any review of critical elements of the regulatory and quality assurance framework must be holistic and any outcomes can only be considered through a lens that simultaneously examines and considers funding implications for all post-secondary education.**

Any proposal to amend the AQF – whether in respect of the inclusion of short-form credentials or how existing Levels intersect for example – can have significant effects on institutional revenue and funding streams. These

¹ *The economic impact of Group of Eight universities*; London Economics; 2018. https://www.go8.edu.au/Go8_London-Economics-Report.pdf

considerations are not limited to universities or higher education. Consideration of these issues must also include how proposals might affect business behaviours in respect of the offer and delivery of some short-form credentials for example.

These are significant and complex issues and cannot be considered in isolation of issues being considered in respect of the Provider Category Standards review, and certainly decisions in respect of either cannot be made in the absence of substantial consideration of the fiscal and broader economic implications, both domestic and international.

Simplification of the AQF

The Go8 is well aware of the far-reaching influence of the AQF. This influence has been well articulated in the Discussion Paper and draws on the *Contextual Research for the Australian Qualifications Framework Review*, undertaken by consultants PhillipsKPA.

Importantly, the background research from PhillipsKPA demonstrates that the **AQF often lacks the necessary responsiveness required of it due in large part to the ‘...complexity of the regulatory and sectoral contexts within which it sits...’²**

This highlights that while the AQF itself is perhaps overly complex and in need of simplification, it is part of a larger regulatory construct. Further, the AQF is often perceived to be a hierarchical qualifications framework in a time in which flexible and multi-directional educational pathways proliferate the landscape and where educational innovation is accelerating. In that context **current AQF is not fit for purpose**.

The AQF is rigid and complex. In a changed and changing educational landscape, it is possible to simplify the Framework so that it can more readily facilitate innovations in educational design and delivery that remain underpinned by robust quality requirements. In addition, a refreshed AQF should simplify level descriptors that often cause needless difficulty in implementation, as well as remove unnecessary detail and overt prescription from all elements of the Framework.

Costs and funding for institutions require consideration

It is vital that there be full and comprehensive consultation on the impact of any proposed changes on the institutional funding profile of universities.

Altering the regulatory arrangements that govern quality qualification design and delivery with subsequent linkages to funding is a critical issue in an increasingly restrictive funding environment. Higher education institutions are currently eligible for public funding in respect of certain AQF Level qualifications that reflect existing structure, classification and nomenclatures. A re-examination of, and amendment to, any of these elements at a level that currently attracts public funding (for example Levels 5 to 10) will have a significant impact upon funding stability.

² [Contextual Research for the Australian Qualifications Framework Review](#); 25 April 2018; PhillipsKPA; p10

These issues reinforce the importance of considering holistically those issues I have raised above related to the review of the Provider Category Standards and other regulatory and quality assurance factors as part of the broader post-secondary education system. This must include issues related to regulatory burden.

Judiciously incorporating short-form credentials into the AQF

Whether or not to incorporate short-form credentials into the AQF is a very complex proposition. There are a range of issues to be considered and addressed, including but not limited to:

- what is the **scope of credentials** being considered for incorporation and how those credentials meet the needs of prospective students and employers;
- **nomenclature is a key consideration** as the significant scope of credentials has led to a substantial range in the description of those qualifications;
- the **implications for other instruments** – including for example, the Provider Category Standards, as well as domestic industrial instruments and international qualifications frameworks – that intersect with the AQF need to be thoroughly considered;
- any proposals to incorporate short-form credentials in the AQF must **be cognizant of the rapidly evolving and flexible educational environment** and how that can **intersect with more traditional qualifications**; and
- a refreshed AQF that incorporates short-form credentials must be **driven by robust quality requirements while simultaneously being conscious of both employer and community needs**.

The inclusion of some short-form credentials must take account of the rapid and disruptive change in educational markets and preferences of consumers as well as the challenges in how some of those course types might be aligned to existing, traditional course types and levels in the AQF structure.

While the Go8 believes there is value in **embracing certain types of short-form credentials in the AQF**, there would be **benefit ensuing the scope for this initially is not expanded beyond self-accrediting institutions, with those institutions afforded to capacity to allocate a short-form credential to an AQF Level where it leads to or offers credit towards the attainment of a qualification at an existing AQF Level**.

- For example, short-form credentials leading to a Masters level qualification.

This would enable those institutions to reflect their mission and context. Prior to commencing a policy of this kind, however, a thorough examination of any specific proposals would need to be undertaken including with respect to the areas of intersect, both from a public policy and funding perspective, across post-secondary education.

To effectively enable this, it might be possible to reconfigure how qualifications are conceived within the AQF with respect to the learning volume requirements also. For example, **rather than maintaining the volume of learning requirements as expressed in years, it might be possible to express these in terms of notional hours**

of learning. This would then have applicability to existing AQF levels and could be applied to short-form credentials where volume based on years is less applicable.

The challenge of incorporating short-form credentials within the AQF is heightened when considering **how any such newly incorporated credentials might align with traditional qualifications.** This presents a real challenge and is combined with the issue of ensuring applicable and standard nomenclature is used within the framework in an area where there is a wide range used to describe similar types of credential.

Questions of alignment with traditional qualifications are important and need to be resolved through the lens of a post-secondary architecture. **As an initial step** then, those questions might be dealt with by ensuring the ability to allocate and deliver a short-form credential to an AQF Level is not expanded beyond self-accrediting institutions.

Senior Secondary qualification must encourage completion with all options open

The Go8 strongly believes that Senior Secondary is a vital part of the AQF. Completion of a Senior Secondary qualification – undertaken and completed at any applicable level in the AQF – is an important part of the pathway to higher education and central to the wider Australian post-secondary education system.

These qualifications must, however, be undertaken with a view to ensuring students retain a full suite of post-secondary options following completion; including the option to participate in university study.

In many jurisdictions, Senior Secondary study is undertaken through a pathway; students are placed on a pathway designed to ensure they are able to apply for entry to higher education; or alternatively on a pathway that does not lead to having that capacity. This is primarily recognised by the completion of secondary schooling that leads to the attainment of an Australian Tertiary Admission Rank (ATAR), or the Overall Position (OP) in Queensland. This system can place barriers before the students who are not on the ATAR/OP pathway from gaining entry to higher education if they subsequently feel that is something that is right for them. Anecdotally, the Go8 understands the split between these groups is close to 50:50 in the groups that are prepared for university study and those who are not.

For students who do not obtain an ATAR/OP, obtaining university entry in subsequent years can be increasingly difficult and it can be the case the programs such as VET in Schools are not recognised for university entry.

A refreshed AQF can ensure that Senior Secondary qualifications – at whichever Level they are delivered – can offer students the choice of a future that Australians expect, and which other qualification also offer.

Alignment with international frameworks

The AQF performs a crucial role in the context of linking Australia with the world of education. In that context, it is important the AQF be aligned to international frameworks.

In recent years examples of the challenges that can present with key partner markets include the differences between Australia and India in the arrangements for AQF Level 7 (Bachelor degree) qualifications to articulate directly into Masters qualifications in India where a four-year Bachelor degree is the required pathway.

Similarly, a revised and refreshed AQF designed in the context of a seamless post-secondary education system must be developed in full consciousness of contemporary practice in like jurisdictions. For example, while some countries incorporate a qualification equivalent of AQF Level 8 (such as the UK), others do not. Indeed, with respect to AQF Level 8, it appears that the Honours qualification only has a contemporary comparative qualification in New Zealand, South Africa and Scotland. The lack of a wider contemporary recognition appears to afford Honours no currency globally and it should be reconsidered in a revised AQF structure.

Noting the apparent lack of alignment with other frameworks, it might be possible to **re-examine the effectiveness and currency of AQF Level 8**, particularly Bachelor (Honours) within a separate AQF Level, noting it appears the existing relationship between and structure of Level 7 and Level 8 is no longer fit for purpose.

Social and enterprise skills

The Go8 acknowledges the importance of what are referred to in the Discussion Paper as social and enterprise skills. These skills are **critical to success for graduates** and the Go8 understands comments that are made by employers from time to time indicating the importance of these skills in potential employees.

It is **desirable that these skills be incorporated into discipline-based outcomes at the institutional level**, which in many cases they currently are, rather than somehow mandated at the qualification level through the overarching regulatory structure.

Seeking to incorporate into that regulatory architecture, a requirement that graduates at an AQF Level will have attained certain of those skills and attributes or be imbued with those, appears an odd construct at best and **more likely to be counter-productive**.

Currently, universities including the Go8 admit students using a number of bases for admission including an assessment of potential to succeed (approximated by the ATAR as one example) based on a range of measures. It would represent a radical unwinding of higher education policy if institutions were placed in a position where, as part of that process, policy signals forced them to screen applicants based on their potential according to



attributes and personality traits such as whether they are and have greater capacity for creativity, empathy, resilience, or whether they work well in teams.

While some university entry programs can and do currently examine some of these traits, they are specifically designed for specific courses – such as assessing a folio of art work (creativity) for admission to an art degree.

Implementing a change of this nature would result in institutions responding to financial and policy incentives by screening applicants to ensure they graduate and, to the extent possible, gain employment based on certain attributes. It would represent a perverse and counter-productive policy that could also have adverse equity effects as people from higher socio-economic backgrounds are more able to afford coaching toward an admission standard in identified skills and attributes.

A further problem would likely exist where qualifications at different AQF Levels can lead to a similar outcome. For example, it is common for people to undertake initial teacher education programs leading to professional recognition and registration at both Level 7 and Level 9. It is important for teachers to be empathetic, creative, collaborative and critical thinkers in the classroom as well as in preparing their work.

Given graduates of qualifications at both Levels (Bachelor and Masters) are treated equally for employment purposes (aside from additional financial reward in *some* circumstances for Masters degree holders), it is not clear how the AQF might indicate an *additional* level of empathy might be required for a Level 9 graduate over a Level 7 graduate.

It might be suggested that the identification of these qualities – enterprise and social skills – are central to talent identification and recruitment of quality employees. While this is not as straight forward as identifying technical expertise, it is not the role of educational institutions to certify personal attributes of students for employers.

The relationship between educational institutions and employers must be viewed as a partnership and this context offers an example of how two elements of that partnership – which is multi-faceted – can work effectively together: only an employer can assess whether a potential employee is the right fit for their organisation, and ensuring they have a level of personal attribute mandated by their qualification level cannot assist that assessment.

A national credit transfer system

The Go8 views any proposal to develop and implement a national credit transfer system, aligned to the AQF, as premature at this stage. It would make more sense to develop such a system for comprehensive consultation in the context of a full review of all post-secondary education so that – at the least – implications for the assurance, regulation and quality underpinning of higher education, vocational education and training as well as senior secondary education can be thoroughly assessed.

I would like to reiterate the concern of the Go8 that this Review take particular heed of the need to consider the AQF alongside the Provider Category Standards and both in the context of the broader Australian post-secondary education environment. As I noted in my comments to Professor Coaldrake, Australia is past a point where we can no longer afford to consider elements of post-secondary education in isolation from one another.



The Go8 readily acknowledges the many complexities in undertaking this Review, some of which I have outlined here. I would of course welcome the opportunity to discuss these issues with you directly.

Yours faithfully,

A handwritten signature in blue ink, appearing to read "V. Thomson".

VICKI THOMSON
CHIEF EXECUTIVE