



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 Geraldine Mackenzie, Vice-Chancellor

Respondent organisation (where relevant)

University of Southern Queensland

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

The University of Southern Queensland (USQ) welcomes the opportunity to contribute to the national discourse on the review of the Higher Education Provider Category Standards (PCS Review).

As a foundation member of the Regional Universities Network (RUN), USQ has had direct input into and gives its full support to the RUN submission to this review. This response should be considered in conjunction with the response submission made by RUN.

There are a number of points which USQ wishes to emphasise. These are summarised below.

It is our view that the overarching framework on which the AQF is premised, is generally sound. However, there are several areas in which changes need to be made

to ensure that the AQF continues to remain fit for purpose including:

- Overall simplification to ensure ease of use and understanding of the framework and the associated regulatory requirements by the general public; and
- Flexibility and agility of the framework to take account of new and emerging developments in education design and delivery.

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.

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.

- *Shorter Form Credentials:* We agree with the notion of incomplete qualifications still leading to some level of recognition, or credentialing. This is important and links to the 'additional learning' in employability skills and capabilities in the affective domain, as well as knowledge, skills and application from the work done in the qualifications. The academic transcript fulfils this function.
- *Enterprise and Social Skills:* While we agree with the idea of including social and enterprise skills, further articulation of these skills may complicate the framework due to the need to be able to validly and reliably assess these. We prefer to emphasise the necessity of social and enterprise skills being embedded and contextualised at the appropriate level within program learning outcomes.
- *The AQF Taxonomy and Levels:* We support the need to simplify the descriptors and merge the two key tables. Splitting 'application' from 'knowledge' and 'skills' might allow for qualifications that are high in knowledge and skill, and weaker in application to be on the same AQF level as ones that are lower in knowledge and skill, and stronger in application. This might solve some of the issues with high school certificates, but would likely add another level of complexity, and even more arguments about equivalence.
- *Senior Secondary School Certificate:* We support the senior secondary school certificate remaining in the AQF framework.
- *Volume of Learning & Credit Points:* Changing from years to hours seems a sensible move forward. However, we would not like to see the removal of hours or years altogether since this would put far too much emphasis on the assessment of graduate outcomes and capabilities, particularly at the capstone level. Perhaps the hours ought to be considered as necessary to comply with, but not sufficient by themselves – and other criteria must be met in addition to the time recommendation.

If a credit point system was to be used, it would be important to articulate how this system would intersect with micro/mini course credentials and this will need some explanation. Having a credit point system in addition to hours would likely unnecessarily complicate recognition between qualifications. Our preference is for nominal hours.

We agree that the current pathways policy is largely ineffective. The credit arrangements would be best dealt with outside AQF to avoid confusion, though some level of oversight is certainly needed for consistency and this might need to be handled in a separate framework. If this is the approach taken, great care would be needed to ensure consistency with the Higher Education Standards Framework 2015, and the revised AQF.

Other

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