



# 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](mailto: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

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Respondent organisation (where relevant)

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

The AQF continues to serve an important purpose, however it would benefit from further articulation of the integration and overlap across VET and HE. There is a clear need to develop consistency of language across levels of learning (VET and HE) and further enhance the AQF to address pure and applied skills and knowledge. The review is moving in the right direction and the proposed changes are positive as they will seek to address some of the current challenges with the AQF.

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.

- International and cultural aspects need to be considered throughout the AQF levels.
- VET alignment with HE needs to be clear and well-articulated – particularly in levels 5,6,7,8.
- Quality assurance issues around integration of shorter form credentials as for HE and VET there are separate regulators, but there is no regulator for the shorter form credentials. However, we would caution against further regulation in this space and believe quality and flexibility should be the combined drivers. As acknowledged in the discussion paper, micro-credentials are in many instances already embedded into fuller qualifications (at both VET and HE level), and the AQF is already detailed and complex. CDU's view is that there is no real need to bring shorter form credentials into the AQF structure as an additional category and thereby risk duplication. It would also be hard to ensure clear pathways within the AQF, given the variability in shorter form credentials.
- The 1200 hours volume of learning metric that equates to a year of full-time study needs to be revisited to ensure it is consistent with a more appropriate work/study/life balance. The focus should be on learning outcomes rather than the number of hours devoted to study.
- Volume of learning needs to be considered in terms of the alignment of the above points and transferability of skills across sectors and in the international market.
- It is considered that AQF should not become involved in the regulation of a standardised credit point system (eg with 1 credit point per 10 hours of learning) to allow more flexibility. This idea would also be a significant complication to VET where there is already a standard 720 hours to one EFTSL conversion factor.
- In the consideration of professional and vendor skills it is worth considering that these could cross several AQF levels.
- Consideration should be given to the fact that not all learning needs to be addressed in the AQF as there will always be learning that occurs outside of the framework. In essence, not all shorter form credentials need to be included to ensure flexibility and the AQF should be limited to regulating the sector.
- Enterprise and social skills are many and varied, and it is probably not realistic to incorporate them explicitly in the AQF. As is the case now, they can be reflected in individual qualifications (and articulation of distinctive graduate attributes) depending on purpose/context.
- We agree that level descriptors do not always help differentiate qualification types at the same level (e.g. level 8), and that it may be useful to revise and simplify AQF taxonomy/descriptors. In doing so it would be important not to increase the complexity, and where possible err on the side of being less prescriptive.
- We agree that sector based qualification types would contradict the need to ensure greater coherence and improve pathways across the tertiary education system.

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.

- There needs to be clarity over volume of learning and transferrable credits
- The inclusion of some enterprise and social skills in the AQF may suffer implementation issues and potential to cause confusion e.g. empathy
- Any new AQF should support providers in identifying linkages between study options, but allow providers to develop education in the appropriate direction (ie support not prescribe that development). The alignment of the relationship between AQF / the standards in VET and HE / the role of the regulators, would therefore need to be clear.
- Any changes to the AQF and the evolution of new study options / microcredentials etc will have cross over into CRICOS registration. Are there opportunities to review CRICOS registration processes to support the changing nature of the qualifications that international students seek? If the AQF is intended, in part, to provide transparency internationally, then the processes intended to support international education in Australia will need to form part of the review.

Other