



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 Clare Pollock

Respondent organisation (where relevant)

Flinders University

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

See below

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.

The Discussion Paper outlines five broad area for possible change. Our submission summarizes our input in each of these areas.

1. Shorter Form credentials

There are different types of shorter form credential which are referred to in the AQF discussion paper which we believe may require a different framework response.

Enabling and foundation courses

We believe that students would be well served if enabling and foundation programs were assigned to an single (current) AQF level to ensure transparency in the skills, knowledge and application of knowledge acquired from these programs. These programs appear to sit most logically at AQF level 4.

Short courses/micro-credentials

Flinders University strongly supports flexibility within the AQF to accommodate the short courses and micro-credentials. There will be increasing demand for short courses and micro-credentials to meet the significant demand for upskilling, reskilling and development of new skills which will be required for a workforce which needs to be flexible and responsive to the changing nature of work and technology. It will be important to embed these within the AQF so they can be quality assured and benchmarked against longer form credentials at each level.

The AQF consultation presentation included a suggested expansion horizontally of current AQF levels. The "Minor course" (or "Micro course", perhaps) suggestion may work best at higher AQF levels where the full qualification have typically longer course durations. Skill sets can (and do) work at lower AQF levels. The assumption would be that in each level there would be a subset of the range of skills, knowledge and application of knowledge in the full qualification, with accordingly shorter typical durations.

2. Enterprise and Social Skills

Enterprise and social skills are important for our future workforce. It is not clear, however, if we have an agreed model for what constitutes enterprise and social skills, and whether these can be adequately measured and assessed across all AQF levels at this point in time. The nature of these skills will be highly context dependent and at present we feel that these are best not embedded as a necessary element in the AQF, but integrated into awards in disciplines at relevant levels to meet specific workforce needs. It is also not clear whether the development of such skills can and does occur at the same rate as other skills, which may create challenges for development of courses within the typical volume of learning outlined in the present AQF.

3. Taxonomies and Levels

Currently the linear nature of the AQF implies a sequential development of skills and knowledge development which may not reflect the intersection and interplay between training and higher education with its emphasis on critical and adaptive thinking. This creates challenges at, for example, AQF 8 where Honours awards and Graduate Certificate/Diplomas are implied to be similar in outcomes. They are clearly different and should be seen as leading to different pathways. Richer descriptions of award types may provide greater transparency for students and employers, rather than relying on a more rigid application of AQF level.

4. Senior Secondary School Certificate

The challenges of identifying a SSSC at one AQF level are obvious and well articulated in the discussion paper. Notwithstanding the challenge, if foundation and enabling programs which are used as entry qualification to higher education programs are aligned to AQF level 4, then this would seem to be the most obvious level for SSSC, notwithstanding that some students will have undertaken elements at AQF level 3 or 5 as part of the SSSC.

5. Volume of Learning

We point out the obvious challenges around specifying a volume of learning for qualifications in an outcomes-focussed framework, and would emphasize that duration can only ever be given as a guide. With increasingly diverse models and tempos of delivery these 'typical' durations are becoming less and less typical. Nevertheless, we agree that some guidance is helpful for education providers and prospective students and removal of volume completely may introduce different challenges.

The discussion paper suggests moving to an hours-based specification, rather than year-based to accommodate the increasing use of compressed academic years, trimesters, intensives and the like. Hours may suffer from the same ambiguity as years, and in a higher education environment which is based around a study load equating to a year, would be difficult to define. If introduced, then equivalence could be provided between years and hours, but this again risks introducing too fixed a model of how learning occurs. Differentiation in how to describe 'volume' at different AQF levels may provide a mechanism to accommodate the diverse needs of the whole education sector.

Introduction of a mandatory credit point system would be costly and timely to implement. It is unlikely that there would be sufficient benefits across all providers to justify the costs of implementation. The development of a recommended alignment between credit points and volume would be helpful to assist students seeking credit transfer and portability between institutions within Australia and overseas. This may also assist in development of future credit transfer technologies across the sector. It would be useful to explore the potential in AQF 3.

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 above

Other