



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

Martin Watson, Executive Director

Respondent organisation (where relevant)

ACT Board of Senior Secondary Studies (ACT BSSS)

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

The ACT BSSS endorses the concept of a national qualifications framework for the purpose of increasing transparency of qualifications for providers, users and the labour market.

The current AQF creates consistency but does not demand conformity. An AQF that provides flexibility is essential in a dynamic, information and technologically rich global economy.

The AQF recognises the Senior Secondary Certificate of Education (SSCE) as an essential credential. It provides a common language for all jurisdictions about the requirements for SSCE. The AQF Qualifications Issuance Policy unifies the nation in terms of creating consistency and coherence in the generation, presentation and issuing of qualifications.

Whilst the AQF recognises the SSCE as a legitimate credential, the specification for the SSCE outlined in the Australian Qualifications Framework 2013 Edition does not recognize that the SSCE can cover a broad range of AQF levels and result in multiple pathways and as such does not align with current practice.

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 ACT BSSS endorses the proposal to revise the SSCE descriptor to recognise that the knowledge and skills acquired in the SSCE covers a broad range of AQF levels and result in multiple pathways.

The suggestion that the SSCE is a foundation credential does not align with current practice or contemporary approaches, knowledge and understanding of optimal student experience and learning in the senior secondary context.

The SSCE credential provides a range of pathways for students. A SSCE credential varies according to the student capabilities, needs and interests. As an example, in the ACT, a student can study an extension course at university gaining credit towards both an undergraduate degree and contribute to the requirements of the ACT Senior Secondary Certificate. In contrast, a student with a mild to moderate intellectual disability may study a combination of subjects that provide foundational knowledge for living and establishing independence beyond school. To describe the SSCE credential as *foundational* ignores the range of pathways that it provides for users and the cumulative effect of the previous years of school education. As such, the SSCE should not be attached to a specific level. Instead, the AQF needs to recognize that the SSCE operates on a range of levels.

The SSCE qualification type descriptor outlined in the Australian Qualifications Framework 2013 Edition can be enhanced in the following ways:

- The statement about the *purpose* could make reference to the global (For example, work and effective participation in local, national and global contexts).
- The statement about *knowledge* needs to reflect a range of levels including foundational, broad and specialized knowledge.
- It is appropriate to make reference to enterprise and social skills in the qualification as it aligns with the Melbourne Declaration and Australian Curriculum general capabilities.

The SSCE qualification type descriptor should not single out a particular pathway at the expense of other pathways (For example, stating a tertiary pathway and ignoring a VET pathway or a combination of the two). In addition, the qualification type descriptor should not state a combination of subjects that can be used as credit towards a tertiary education. Specific details relating to a pathway or combination of subjects may inadvertently create a hierarchy of pathways which can have an adverse impact on student expectations and lives. In addition, defining a tertiary pathway could impact both the labour market and the broader economy.

It should not be underestimated how the AQF can influence policy and decision making. The spirit of the AQF should be to provide leadership and guidance and through them create flexibility and innovation.

An AQF that recognizes shorter form credentials and makes provision for stacking these credentials is important for education providers and users. This flexibility aligns with literature on 21st century learning which requires individuals to engage in continuous learning in order to adapt to a changing economy or community expectations. Balancing this is the need to maintain coherence and depth through all courses of study.

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

The ACT BSSS recognises shorter form credentials as contributing towards SSCE. Shorter form credentials are most effective when they lead to achievement of a full award, certificate or qualification. The temptation is to align the shorter form credential with a level. To create flexibility and provision for innovation it would be in the interests of both providers and users that shorter form credentials are not attached to specific levels. Likewise, the SSCE credential should not be attached or aligned to any specific AQF level. Educational institutions, senior secondary certification authorities and the market are best placed to make decisions regarding use of shorter form credentials towards a qualification.

Enterprise and Social Skills

It is crucial that the senior secondary students demonstrate enterprise and social skills to participate in life and enhance employability and/or successful transition to further education. Any omission of enterprise and social skills in the AQF will render the document out of touch with current research and practise. More importantly, an opportunity to provide leadership and cue providers to review their practices are not in the interests of users or the national interest. Mention of enterprise and social skills could occur in the qualification type descriptor and levels. Enterprise and social skills can be assessed in context.

Volume of learning

Any revision of the volume of learning and credit points must consider the impact of VET in schools. Defining a 'new learner' may have dramatic negative implications on delivery of VET in schools. Perhaps in the AQF context there is no need to define the learner.

An alternative perspective...

Consideration could be given to the removal of reference to Volume of Learning in the AQF. Volume of Learning should be replaced by 'Learning Timeframe' or an equivalent description. Hence, as an example, the qualification descriptors would list *Learning Timeframe* followed by *The learning timeframe of a Certificate I is typically 0.5 – 1 year.*

Reference to 'typical' should only apply in the context of the general linear time range of study engagement/programs because inferences drawn from the quantification of learning will limit flexibility, negate adaptable and context driven mode and pace of delivery, and undermine recognition of the individual nature of the learning journey.

Other

Consideration needs to be given as to whether the removal of the AQF Qualifications Register Policy will impact the national register ,or the USI registry, or data management practices.