



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

Neil Peplow (CEO) & Nell Greenwood (Director of Curriculum & Student Registrar)

Respondent organisation (where relevant)

Australian Film, Television and Radio School (AFTRS)

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

AFTRS provides a range of award and non-award education and training programs for the screen arts and broadcast sector, as per our enabling legislation under the Australian Film, Television and Radio School Act 1973 (AFTRS Act (1973)).

For specific program types, refer to the 'Other' section below for more details.

Shorter Form Credentials – No Intended HE Pathway

Most of those considered to be shorter form credentials (short courses, industry certificates, school holiday programs and MOOCs) have no specific relationship to the AQF. They have varied volumes of learning which range from a few hours to several months and differ in their target audience from primary school-aged children on school holidays to established industry professionals seeking to up-skill themselves in the latest tools, technology and techniques.

These courses are critical to the School achieving its remit under the AFTRS Act (1973). A portion of the Federal Government's appropriation is used to subsidise these high quality, resource intensive courses to ensure that the TV, film and radio industry's remain globally competitive. Participants regularly return to these programs due to their ability to provide the reach, relevance and reactivity to industry & technology changes.

In particular the Industry Certificates and Short Courses relate to clause 5.1.a of the Act which states: *"to conduct such seminars and courses of education or training for persons engaged, or to be engaged, directly or indirectly, in connexion with the production of programs as are approved by the Council."*

The organisation sees them as distinctly separate to any pathway to the higher education offerings and has not aligned them with any HE credit recognition.

The fact that they have no relationship with the AQF is not to suggest that they are of low quality, but rather that students in these programs are more interested in direct competency development rather than a recognised qualification.

For this reason, we would see their continued need to co-exist separately from the AQF.

Shorter form credentials, where there is no intended HE pathway, are not specified in the AQF and therefore the AQF is fit for purpose.

Shorter Form Credentials – Intended HE Pathway

However, where a shorter form credential has a specific focus towards higher education (e.g. a micro-credential with direct credit to a postgraduate course), we would like to see these recognised within the AQF.

As the discussion paper outlines, the nature of professional work and its relation to learning and teaching is changing rapidly and these changes will impact the skills and knowledge that graduates will need to possess.

We believe the AQF should play an active role in the recognition of these changes as they related to higher education qualification requirements. These reforms are explained further in the next discussion question.

Shorter form credentials, where there is an intended HE pathway, are not specified in the AQF and therefore the AQF is not fit for purpose.

Enterprise and Social Skills

The screen arts and broadcast sector that, through the AFTRS Act (1973) AFTRS supports and operates within, has creativity at its core as we prepare our graduates to become the great storytellers of the future. Instilled within the learning and teaching are the AFTRS Values which strive for mastery, encourage daring, believe in merit, practice generosity and working together.

These qualities could easily lend themselves to be considered *enterprise and social skills*.

AFTRS' Curriculum Model embeds cultural competency attributes into course learning outcomes against the qualification type skills in the AQF, however a more detailed representation against the field of education in which we work within would be beneficial.

Enterprise and social skills are not specified in the AQF and therefore the AQF is not fit for purpose.

AQF Taxonomies and Levels

AFTRS, too, has found that at times throughout the AQF, the descriptors for levels and qualification types intersect but do not always align.

For example, the qualification type descriptors between a Graduate Certificate and Graduate Diploma at Level 8 are almost identical, save for the volume of learning and '*specialised*' vs '*advanced*' knowledge definition.

Regarding Diploma and Advanced Diploma qualification type descriptors, these are also becoming increasingly harder to relate to back to courses of study for the screen arts and broadcast sector. The need for high level craft skills, conceptual knowledge and entrepreneurial skills are required at greater levels of ability the further up the career ladder graduates advance.

The qualification type descriptors should be revised in order to provide more specific descriptors, unique to that level and/or qualification type and sector.

Taxonomies and levels in the AQF are not fit for purpose.

Senior Secondary School Certificates (SSCE)

All AFTRS award courses are based on entry by merit selection only. We do not assess by ATAR and all applicants must satisfy certain admission requirements, as well as conducting rigorous application tasks.

Within our undergraduate offerings, all applicants into these programs must be due to complete their Higher School Certificate (or equivalent) by the start of the program.

No further analysis other than possession of Higher School Certificate (or equivalent) is undertaken, however applicants who believe they have achieved the learning outcomes of a senior secondary certificate of education through means other than formal schooling (such as professional experience) are asked to enquire further and discuss equivalency options.

For example, AFTRS does not provide any form of credit or RPL to students based on subjects undertaken at secondary school level. This would be unlikely to change if the SSCE were to be linked to an AQF level(s).

Although it is useful to have a section in the AQF relating to the Senior Certificate of Education, we see little value in assigning it to a particular AQF level(s) given the varied nature of study options attributed to it.

The SSCE descriptor in the AQF is fit for purpose.

Volume of Learning

The volume of learning is a critical component of the AQF.

We see it as a necessary, definitive component of qualification development. Whilst there is an understandable appreciation that a defined volume of learning may go against the philosophy of competency-based learning, we see it as a fundamental tool for student engagement and personal development. From an operational perspective, it is also seen as a vital tool in the determination of a curriculum's design and structure.

However, AFTRS feels it is not detailed enough and that it leaves itself unhelpfully open to interpretation. This is explored further in subsequent discussion questions.

The volume of learning in the AQF is not fit for purpose.

AQF Policies and Explanations

AFTRS agrees with PhillipsKPA's report that that the current policies in the AQF be removed and treated as stand-alone policies in their own right.

We see some of the AQF policies as still current, whilst others require updating – those will be addressed at the next discussion question.

In regards to the Qualifications Pathway Policy and credit transfer registers specifically, the current arrangement where providers maintain their own publicly available registers seems fit for purpose. However, the discussion paper outlines possible concerns that applicants are not aware of what credit they may be entitled to and how they can apply for it. If this is to be the case, one option may be to have more stringent requirements for reporting in the 'Advanced standing / credit transfer / recognition of prior learning (RPL)' information set as part of the Department's *Improving the transparency of higher education admissions* report and implementation plan.

The Qualifications Register Policy and the Qualification Type Addition and Removal Policy are fit for purpose.

The Qualifications Pathways Policy is partially fit for purpose.

The Qualifications Issuance Policy is not fit for purpose.

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.

Shorter Form Credentials – Direct HE Pathway

The following shorter form credential types should be recognised within the AQF:

Enabling Courses

AFTRS has previously offered enabling courses, with mixed success in generating student pathways. Enabling courses have caused confusion with taxonomy for some students. HELP funding (in AFTRS case, FEE-HELP) is available to enrolled enabling course students, yet enabling courses are not defined in the AQF and therefore not considered an award course.

An alignment of qualifications permitted for HELP funding against the AQF would be advantageous.

Micro-credentials

AFTRS, like most providers, is constantly challenged with being able to quickly respond to the needs of industry, given the fast pace of technological change, and in a changing higher education framework. The screen arts and broadcast sector is one that thrives on innovation and this is a value we extend to the classroom.

AFTRS is supportive of micro-credentials and, although a relatively new concept, believe they have a place in a modern learning environment. They build and assess participants' knowledge, skills, and abilities to confidently and capably serve an educational need and we see a natural alignment with knowledge and skills attributes against the AQF.

The fact that micro-credentials are seen as mostly competency-based, on-demand, personalised and shareable suggests strong parallels with the VET sector, however we acknowledge that there are some higher education providers making interesting inroads in their application and use.

We agree that they should be included in the AQF and should apply across all levels. AFTRS can see particular benefit in applying them against technical skills and post-graduate business modules.

An alternative to their inclusion at all levels may be a separate, specifically outlined qualification in their own right (i.e. with no level attached) in a similar context to the specification for Senior Secondary Certificate of Education (SSCE). Their addition should include how the bundling or 'stacking' of micro-credentials informs credit and RPL arrangements.

Enterprise and Social Skills

AFTRS agrees with the recommendation that the AQF should be amended to reference enterprise and social skills against a particular sector(s).

One option may be to assess whether it is possible to group sectors according to the Department of Education and Training (DET) funding cluster groups. In the other countries, for instance, different fields are able to articulate distinct standards that courses are required to demonstrate.

AQF Taxonomies and Levels

We support the following approaches as they relate to the AQF taxonomies and levels:

- The use of level descriptors to outline common high-level knowledge and skills at AQF levels only, whilst utilising qualification type descriptors to supplement only additional attributes specific to a particular qualification type.
- A clearer set of definitions for skills and knowledge, via the introduction of context themes, such as autonomy and responsibility. This would more easily assist providers in shaping their course of study requirements.
- The introduction of minimum proportions of content required within a qualification type.

For example, a 3-year Bachelor Degree to be comprised of a minimum 33% AQF 5 teachings and 50% AQF 6 teachings or similar.

Qualifications developers would benefit from this assessment as it would allow them to build stronger frameworks for more appropriate and stringent course design.

This would also help tighten the linkages of nested courses.

- An expansion and modernisation of the AQF Glossary of Terms.

Volume of Learning - Measurement

AFTRS recognises and appreciates the fact that the AQF refers to a *typical* learning duration.

However, we agree with assertions that this variability is causing problems for providers to be able to operate on a level playing field as well as causing confusion for students as to the validity of a program offered by one provider over another.

For example, the AQF currently states that the volume of learning for a Bachelor Degree qualification is *typically 3-4 years*. Yet, organisational initiatives such as trimesters vs semesters, accelerated programs, etc, have seen some Bachelor programs enter the market with an advertised 2-year duration.

Such discrepancies have the potential to erode confidence in the sector and confusion over the quality of offerings.

AFTRS supports the following reforms to the measurement of volume of learning:

- The unit of measurement of volume of learning be converted from years to hours.

- A defined *minimum*, rather than typical, amount of learning specified. This may be on the basis of entry level students into a qualification (or ‘new learners’, as was appropriated by ASQA in the discussion paper). Those students who have an already established set of skills and knowledge at or beyond the qualification level should seek to have their abilities formally recognised through credit and RPL arrangements.
- Such defined amounts of learning to be broken down further into proportions of (a) minimum guided learning, and (b) minimum self-directed learning. This would give students certainty of learning expectations.
- Amounts of learning at either the minimum or above, as expressed in hours, be reported at the Course of Study data level in HEIMS reporting.

If minimum durations were to be introduced, they should be seen as baselines only and that there should be encouragement to go beyond minimum durations, particularly where qualifications are directly aligned to an industry need and the reputation of an organisation to produce high quality graduates may be at stake.

AQF Qualifications Pathways Policy

AFTRS is of the view that the AQF *should* continue to have a policy regarding pathways and credit.

If the AQF is to be the ‘source of truth’ of regulated qualifications for both the HE and VET sectors, it would seem appropriate that the current arrangement be maintained, particularly where qualifications (E.g. Diploma) span across both sectors.

We would like to see greater explanation of ‘nested courses’, as it relates to student pathways, and how such arrangements comply with entry and exit options. Clause 2.1.10 of the Pathways Policy regarding recommended credit agreements should be more comprehensive, provide more specific advice on articulation and set minimum, in addition to negotiated, levels of credit for formal learning.

AQF Qualifications Issuance Policy

AFTRS also believes that, due to its use stretching across both the HE and VET sectors, that this policy be retained as a single approach to qualifications issuance.

One issue that AFTRS would like investigated further is that of Graduation Statements. Section 2.1.1 of the policy describes:

“A graduation statement will also be issued as its usage is adopted across the education and training sectors.”

Much has been conducted with the universities in relationship to graduation statements, however there has been little push to have independent higher education providers adopt this initiative.

AFTRS fully supports the concept of graduation statements, however we would like to see a more stringent viewpoint on their value within the above policy and whether they should be the compulsory third set of certification documentation for graduates, along with a testamur and record of results. If that is the desired outcome, AFTRS would also like specific guidance on their issuance.

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.

Volume of Learning – AQF Reference Credit Point System

AFTRS supports the notion of a national credit point system.

Our experience with credit points has been that our students find them an easy and convenient method of attributing the weighted value of a unit of study and course of study.

The metric of 1 credit point per 10 hours (as stated in the discussion paper), if adopted, would require a structural re-alignment of our award course suite of offerings given that there is a significant different weighting to that currently used at the School. This would take considerable time to be worked through. As such, a carefully considered, long-term implementation would be recommended.

However, we agree that the benefits of more simplified comparisons of qualifications, learning outcomes and credit / RPL arrangements across the sector would be advantageous.

Other

AFTRS Background

The Australian Film, Television and Radio School (AFTRS) welcomes the opportunity to provide feedback on the Review of the Australian Qualifications Framework (AQF).

AFTRS strongly supports a change to the AQF.

AFTRS was established by the Australian Film Television Act 1973 for the principal purpose of providing higher education to the screen arts and broadcast sector.

Our purpose is to find and empower Australian talent to shape and share their stories with the world by delivering industry-relevant and future-focused education, research and training. We seek to be the reference point for innovation in screen, sound and story-making, globally. To ensure AFTRS reflects Australian society, diversity is supported across all the School's activities, with a focus on supporting the best talent, from all backgrounds, into careers in the industry.

We act in the national environment as both an Australian government statutory authority and national cultural institution that focuses particularly on the needs of the screen and broadcast industries, and, as an accredited institution, providing higher education and training.

Our education and training programs are in the following areas:

- Higher Education courses (undergraduate and post-graduate levels)
- Industry Certificates (non-award)
- Customised Corporate & Teacher Training
- Short Courses

- Summer Intensives
- School Holiday Programs

AFTRS has full self-accrediting authority (SAA) status to accredit its courses with TEQSA; one of only three independent (non-university) Higher Education Providers to have achieved this.

All responses to the discussion paper in this submission are in the context of this classification.

As a federal statutory authority, AFTRS degrees, diplomas and certificates are permitted by way of determination of legislative instrument, as required under the AFTRS Act (1973).