



# 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

Dr George Markakis

## Respondent organisation (where relevant)

This submission is made jointly by the **Academy of Film, Theatre & Television** and the **JMC Academy**.

### Background

The Academy of Film, Theatre & Television (AFTT) offers recognised vocational education and training in all areas of film, theatre and television, from singing and dancing on stage to acting for a television mini-series, from rigging lights to designing sound; interpreting a Director's cinematic vision on screen to editing and post production on a high end commercial ... and everything in between. To this end we teach our students to be highly adaptable, experienced and exceptionally skilled to address a broad range of opportunities in these creative industries.

AFTT is a small private RTO with a history of over 25 years. It operates from facilities in Holt St, Surry Hills, Sydney and is the trading name of the International Film School Sydney Pty Limited, a training provider registered through the Australian Skills Quality Authority (ASQA)<sup>1</sup> and is approved to conduct the following Training Package qualifications:

- CUA51015 Diploma of Screen and Media and
- CUA60615 Advanced Diploma of Screen and Media

<sup>1</sup> <https://training.gov.au/Organisation/Details/91143>

Both of these qualifications are structured (within Training package rules) to be delivered to meet the requirements of three industry areas, Film, Acting and Live production. AFTT is also approved to conduct an accredited course for which it is the copyright owner with JMC Academy, namely

- 10691NAT Advanced Diploma of Stage and Screen Acting

JMC Pty Limited trading as the JMC Academy is registered with TEQSA<sup>2</sup> and categorised within the Provider Category Standards as a non-self-accrediting Higher Education Provider (HEP).

The JMC Academy was established in 1982 by John Martin Cass to meet the demand for qualified professionals in the entertainment technology industry. Currently JMC has campuses in Sydney, Melbourne and Brisbane, with 1700+ student enrolments and offers Higher Education Degrees and Diplomas in Music, Songwriting, Audio Engineering, Film and Television Production, Entertainment Business Management, Digital Design, 3D Animation and Game Design all now regarded as being part of the Creative Industries.

The JMC Academy also offers a Master's degree in Creative Industries with a nested Graduate Diploma qualification and is a RTO approved to conduct the Certificate II in Music Industry and Certificate III in Screen and Media courses.

JMC Pty Limited wholly owns the International Film School Sydney Pty Limited.

A formal arrangement is in place for successful Advanced Diploma students with a focus on Film to articulate from AFTT into degrees at JMC. A similar articulation arrangement is also planned for successful Advanced Diploma students with a focus on Acting into the proposed degree in Acting.

Consequently both JMC and AFTT have an interest in the cross over qualifications at levels 5 and 6 of the AQF with JMC also having an interest with AQF 8 level qualifications.

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

JMC and AFTT maintain that the different and inconsistent approaches in aligning cross-over level 5 and 6 courses in the VET and Higher Education (HE) sectors to the AQF cause unnecessary articulation issues. As a consequence these issues with VET Diplomas and Advanced Diplomas articulating to HE Associate Degrees and Degrees prevent or create unnecessary barriers to individuals wanting to develop their full educational potential and consequently their full employment or career potential.

JMC and AFTT maintain that the AQF should be redeveloped to facilitate, even mandate, greater alignment of qualifications offered by different educational sectors. In particular to JMC and AFTT there must be greater alignment of AQF requirements and specifications for

---

<sup>2</sup> <https://www.teqsa.gov.au/national-register/provider/jmc-pty-limited>

cross over qualifications at AQF levels 5, 6 and 8.

JMC and AFTT also maintain that much of the debacle of the operation of the VET FEE-Help scheme could have been prevented had the AQF been more specifically defined and more rigorously applied across all AQF level 5 and 6 qualifications, but particularly to those provided by unscrupulous VET sector providers.

### **Alignment of Courses and Qualification with AQF**

JMC and AFTT are well placed to comment on the implementation of the AQF because

- AFTT recently completed a successful re- accreditation of the Advanced Diploma of Stage and Screen Acting, managed by ASQA
- JMC recently completed a successful accreditation of a Master of Creative Industries with a nested Graduate Diploma, managed by TEQSA, as well as having been through a number of other degree re-accreditation processes
- JMC is currently in the process of developing a new Bachelor's degree in Acting with a nested Diploma and Associate degree, developed in awareness of the Advanced Diploma of Stage and Screen Acting
- AFTT is closely monitoring and commenting on the review of the CUA training package
- JMC has entered into an articulation arrangement with AFTT for VET Diploma and Advanced Diploma into JMC Degrees and Associate Degrees.

As one can expect, great consideration of the alignment of qualifications to the AQF was required throughout all of the successful accreditation and re-accreditation processes and throughout the current development of courses and new articulation arrangements.

What we noted however, was that the work involved with submissions to TEQSA had a greater focus on the alignment with the AQF than the Advanced Diploma submission to ASQA. This highlighted the differing priorities of the two regulatory bodies, being:

- TEQSA is much more demanding in terms of curriculum, pre-requisites and alignment with AQF than ASQA
- ASQA is more demanding in terms of relationship with industry and ensuring competency based approach to content, with seemingly less interest in alignment with the AQF

In taking this into consideration, the HE course development process seems to be very much predicated on justifying and explaining the level of the qualification by demonstrating alignment within the taxonomy of the AQF. Whereas the VET training package qualification development process seems to JMC and AFTT to be primarily predicated on defining the level of the qualification to meet industrial relations considerations without needing to demonstrate and/or justify alignment with the level described within the taxonomy of the AQF.

So to JMC and AFTT one of the major issues of the AQF, particularly for the sector overlapping qualifications of Diploma and Advanced Diploma, is that the VET sector does

not appear to be greatly interested in the educational alignment of their qualifications to the AQF.

It appears that in simple terms, developers of Training Package qualifications are much more interested in ensuring that VET qualifications meet preconceived ideas of what qualification level is relevant to what job i.e. the job defines the qualification level irrespective of the knowledge and skill requirements, with very little reference to the actual specifications of the AQF. Due to the different and inconsistent approaches to aligning cross over level 5 and 6 courses in the VET versus the higher education sectors to the AQF, unnecessary issues in relation to articulating from VET Diplomas and Advanced Diplomas to higher education Associate Degrees and Degrees are created. Consequently, as mentioned earlier, this prevents or creates unnecessary barriers to individuals developing their full educational potential and consequently their full employment or career potential.

### **Alignment of Entrance Requirements of Qualifications across AQF Levels**

Similar to the alignment of courses to the AQF there are considerable differences between the VET sector and the HE sector in relation to qualification entrance and progression requirements.

The HE sector requires considerable attention to be given to entrance requirements based primarily on education achievement or on demonstrated work experience and these requirements have to be articulated and be justifiable. The HE sector also requires considerable attention to be given to progression arrangements through a qualification or between units/subjects at different levels of the qualification. This is certainly the case for all the HE courses conducted by JMC.

Both JMC and AFTT are involved with cross over AQF level 5/6 qualifications including articulation arrangements across sectors. In particular AFTT offers VET sector Training Package diplomas

- CUA51015 Diploma of Screen and Media and
- CUA60615 Advanced Diploma of Screen and Media

Neither of these qualifications have any entrance requirements – the formal statement in the CUA training package for both qualifications in this regard is Nil<sup>3</sup> <sup>4</sup> and there are no progression requirements through the units of competency of these qualifications. Consequently it is left to the VET provider to determine the entrance and progression requirements consistent with RTO standards.

For its courses AFTT has developed its own entrance requirements including audition and interview processes as well as specifying English language requirements. JMC has also developed similar entrance requirements as part of the accreditation requirements set by TEQSA.

---

<sup>3</sup> <https://training.gov.au/Training/Details/CUA60615>

<sup>4</sup> <https://training.gov.au/Training/Details/CUA51015>

Consequently both AFTT and JMC are concerned that the VET sector has been driven into disrepute by unscrupulous providers, in part, by exploiting this lack of entrance requirements for Diplomas and Advanced Diplomas. It should be noted that the Australian Competition and Consumer Commission began prosecuting a VET provider (currently in the Supreme Court) for false, misleading and unconscionable conduct and for aggressively selling courses to vulnerable students, including the unemployed, who had little hope of completing their qualifications i.e. failing to implement any form of appropriate entrance requirements.

To JMC and AFTT such actions would not have been possible if all AQF level qualifications, particularly the crossover sector qualifications at AQF levels 5 and 6, had explicit educational and/or work related experience entrance requirements.

The above concerns of AFTT and JMC have clearly been shared by the Commonwealth Government in the drafting of the VET Student Loans Rules 2016<sup>5</sup>, where at section 80 (2) the Commonwealth has legislated academic and English language entrance requirements for such qualifications as necessary for operating within the VET Student Loans scheme.

### **Alignment of Volume of Learning Requirements Across AQF Levels**

To the best knowledge of JMC and AFTT there has been no public debate or regulatory concern about short period higher education qualifications offered by universities of higher education providers. The higher education sector does not have a culture of “how short”, “how cheap”, “how reductionist” can we make our courses and still award the qualification. Yet this culture is still relatively wide spread in the VET sector. For some in the VET sector it appears that price and duration/volume of learning rather than quality is the dominant market driver for their courses.

The capacity for some VET providers, masquerading under the banner of competency based training, to offer short period VET qualifications is enhanced, even facilitated, by there being no evident AQF bases in VET qualifications. Consequently acknowledgment or adherence to the requirements of the AQF is primarily at the discretion of the VET provider.

Admittedly the concept of volume of learning is complex and for an individual student can depend on a number of factors including, approach to learning, life experience, related work experience, academic qualifications and English language capacity to name a few.

The AQF handbook defines Volume of learning as

*The volume of learning is a dimension of the complexity of a qualification. It is used with the level criteria and qualification type descriptor to determine the depth and breadth of the learning outcomes of a qualification. The volume of learning identifies the notional duration of all activities required for the achievement of the learning outcomes specified for a*

---

<sup>5</sup> <https://www.legislation.gov.au/Details/F2019C00065>

*particular AQF qualification type. It is expressed in equivalent full-time years.*<sup>6</sup>

The VET sector at large, driven by industry just in time demands exploits this concept of volume of learning by claiming that volume of learning must be considered variable in a competency based system. However, in the absence of any direction within the qualifications and the AQF, many VET providers, as demonstrated by their actions under the previous VET FEE-HELP regime, gave or were required to give, little regard to the consideration that new learners will need more time than people with related work experience or previous related backgrounds and further that people with low levels of English language capacity will also need more time or more support.

Similarly little regard was given to or required to be given, by these providers, to the delivery and assessment modes of the qualifications resulting in the proliferation of short face-to-face requirements, extended self-paced, online, technology enhanced learning approaches and a greater reliance of self-managed learning. In adopting these approaches JMC and AFTT saw that these providers were again ignoring or paying little attention to the capacity or experiences of individual learners.

ASQA has recognised these arguments in its FAQ's<sup>7 8</sup> when it tries to provide advice to RTOs on what constitutes amount of training or volume of learning.

However AQSA's cause is not helped by the limitations of the current approach to defining Volume of Learning in the AQF which is restricted to years and hours without really defining what makes up hours.

The AQF handbook also states that:

*The volume of learning allocated to a qualification should include all teaching, learning and assessment activities that are required to be undertaken by the typical student to achieve the learning outcomes. These activities may include some or all of the following: guided learning (such as classes, lectures, tutorials, on-line study or self-paced study guides), individual study, research, learning activities in the workplace and assessment activities.*<sup>9</sup>

Taking this into account, a hypothetical question posed by JMC and AFTT is *"if 1200 hours is the volume of learning for a full time AQF level 5 course, can 10 hours of face to face classes and 1190 hours of self-managed learning/ individual study be considered as meeting the requirements of the AQF"*. Under this definition the answer is probably "yes" or "maybe" or "no" according to VET sector RTO standards.

A foundation indicator of volume of learning is found in the Victorian purchasing guides<sup>10</sup>. Assuming these purchasing guides are predicated on the hours required for new learners we have:

<sup>6</sup> <https://www.aqf.edu.au/sites/aqf/files/volume-of-learning-explanation-v2-2014.pdf>

<sup>7</sup> <https://www.asqa.gov.au/faqs/what-appropriate-volume-learning-qualification-type>

<sup>8</sup> <https://www.asqa.gov.au/news-publications/publications/fact-sheets/amount-training>

<sup>9</sup> <https://www.aqf.edu.au/sites/aqf/files/volume-of-learning-explanation-v2-2014.pdf>

<sup>10</sup> [https://www.education.vic.gov.au/Documents/training/providers/rto/vpqcucreativeartsandculture\\_current.pdf](https://www.education.vic.gov.au/Documents/training/providers/rto/vpqcucreativeartsandculture_current.pdf)

- CUA51015 Diploma of Screen and Media needing somewhere between 979 and 1,030 hours whereas the AQF volume of learning of a Diploma is typically 1,200-2,400 hours.
- CUA60615 Advanced Diploma of Screen and Media needing somewhere between 941 and 990 hours whereas the AQF volume of learning of an Advanced Diploma is typically 1800-2400 hours

Clearly State governments are not taking the AQF Volume of Learning requirements into account when it is expected that the requirements of the Diploma are more than the requirements of the Advanced Diploma.

Further to this, the ESOS National Code requires an average 20 contact hours per week for international students. So in using these figures as a basis, as is done by many VET providers, it is expected that there would be a requirement of 51.5 weeks for a Diploma and 49.5 weeks for an Advanced Diploma. On a 36 academic weeks per year basis both qualifications would fit into the 1-1.5 years.

Based on the above examples, to JMC and AFTT, the construct of Volume of Learning within the AQF needs considerable work to overcome some of the existing confusions and to close loopholes exploited by unscrupulous providers.

To this end JMC and AFTT would propose that Volume of Learning within the AQF could be specified by hours and percentages for 3 categories of learners. For example:

Category of Learner	Min % as Scheduled supervised/ facilitated hours	Max % as Self-managed hours/workplace hours	Max % as Self-paced hours	Total hours
New learner with no related educational or work background				
New learner with related educational or work background				
Learner currently in related work				

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.

**Tenets of this Submission**

The main tenets of this submission from JMC and AFTT are that the AQF should be redeveloped to facilitate, even mandate, greater alignment of qualifications offered by different educational sectors. In particular to JMC and AFTT there should be greater alignment of AQF requirements and specifications for cross over qualifications at AQF levels 5, 6 and 8.

The current AQF qualification type learning outcomes descriptors for qualifications or any new course structures at each AQF level should not only include

- purpose
- knowledge
- skills
- application of knowledge and skills

But also

- explicit educational and/or work related experience entrance requirements;
- explicit English language requirements expressed for domestic students by reference to secondary school grade levels and for international students by reference to an internationally accepted testing result levels or their equivalence; and
- a redefined volume of learning specified by hours and percentages for 3 categories of learners, such as

Category of Learner	Min % as Scheduled supervised/ facilitated hours	Max % as Self-managed hours/workplace hours	Max % as Self-paced hours	Total hours
New learner with no related educational or work background				
New learner with related educational or work background				
Learner currently in related work				

**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.**

For any new AQF to be of value it is clear that it needs to be fully accepted and implemented by governments and industry.

Such acceptance is demonstrated by having clear policy directions, regulations and guidelines for all qualifications and qualification levels and in particular for the levels that cross the VET/HE interface namely current levels 5, 6 and 8.

For the revised AQF, to be of value, it also needs to be embraced by both sector course accreditation bodies (particularly the VET accreditation body) and the training package approval/endorsement authorities to ensure that all qualifications or other course structures registered/accredited/endorsed as AQF awards have:

- overt evidence of alignment with all requirements of the AQF and not just token assurances or industry party directions to Training Package developers;
- explicit educational and/or work related experience entrance requirements together with English language requirements expressed for domestic students by reference to secondary school grade levels and for international students by internationally accepted testing result levels or their equivalence; and
- overt specification of volume of learning specified by hours and percentages

**Other**

--