



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 Stephen Naylor

Respondent organisation (where relevant)

James Cook Univeristy (we have also contributed to the IRU response)

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

We acknowledge that the AQF does provide a framework that accommodates the diversity of VET and higher education training, although it is less relevant for the higher education system especially at the postgraduate level where mobility and transferability of qualifications are fairly well recognised through the Bologna system. Other positive characteristics include a better mapping of pathways leading to qualifications and the significant work done in mapping standards for higher education degrees and clarifying course learning outcomes.

The challenge to the current AQF is that as the Tertiary system innovates and post-secondary education becomes more commercialised by private providers and a fairly aggressive expansion in higher education, there has been some breakdown of taxonomy, consistency and interpretation of the framework. For higher education much

of this is managed through our academic governance and self-accreditation status, whereas the VET sector relies on national standards and training packages.

Our initial analysis and the AQF forum have identified the challenge associated with courses that are credentialed but delivered in smaller timeframes. The range of credentialed short courses and non-credentialed courses (micro-credentials) are certainly seen as the future in post-secondary education but do pose challenges in order to define qualities of the learning and how they would be re-aggregated into larger qualifications, should this be necessary. For those non-self-accrediting providers there are real challenges with guaranteeing the status of micro-credentials which may have good market value and be responsive to training needs but not to fit within the framework. Registering and credentialing these micro-credentialed courses aligned with the AQF could be done by a private provider by engaging TEQSA experts, but this would create a huge volume of work if TEQSA sought to manage these. The continuous professional development programs (CPD) that have been delivered for various professional bodies have always sat in this uncomfortable space within the AQF; although most CPD is developed for participants with at least AQF 7 qualifications generally they do not rely on recognition or credentialing for qualification purposes. Maybe this is where the micro credential will eventually be parked?

The enterprise and social skills were discussed, however, these have particular discipline narrative issues and are fairly broad for the suite of courses offered in higher education. These enterprise and social skills at a generic level would be recognised as beneficial for graduates but determining an AQF level or set of descriptors seems to be a challenge not well suited to the framework. These particular skills probably have a more pedagogical necessity and should be managed within individual courses not the AQF. Some of these skills also have a cultural context and could be quite a challenge for the international student cohort.

The AQF forum certainly saw benefit in collapsing qualification type learning outcome descriptors into generic specifications tables. Volumes of learning were seen to be subject to interpretation by most institutions, with a classic example of a level 7 AQF bachelor's degree being offered in trimester mode and achieved in 2 ½ years, compared to a bachelor of medicine which could take up to 6 years to complete the same AQF level 7 attributes. The framework purely provides guidance.

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.

JCU sees the AQF as a purposeful document that could receive some minor refinements in association with descriptors and taxonomy, recognising the challenge between competency-based qualifications in VET and capacity/capability centred programs offered in higher education. There seemed to be some conflation between the AQF level and the status of named higher education qualification for the average employer, this is especially the case with postgraduate qualifications with real confusion around the AQF level 8 and the diversity of masters programs fitting into professional, research and coursework. There is also little value achieved by allocating an additional level 10 to

a PhD or a coursework doctorate and the thought of collapsing the AQF into undergraduate (AQF 7) and postgraduate (AQF 8) did have some appeal amongst some staff. Finally the shorter form of credential will be the big challenge for the AQF in the near future, the likelihood that technology such as block chain databanks may provide some form of portfolio does have some promise but currently the sector is lacking direction and heading in all different directions. Some clarification in this area would be beneficial although anything too rigid would probably be 'worked around' as is the case with the volume of learning in the current AQF.

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.

Please see statement above

Other