



# 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**

Jennifer Mason

**Respondent organisation (where relevant)**

Victorian Building Authority (VBA)

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

The VBA prescribes Higher Education and VET qualifications (as well as VET units) for plumbing practitioner registration and licencing purposes and building practioner registration. Overall, the AQF is fit for purpose; however, this review is timely and there are gaps that need to be addressed as well as industry needs that can be better addressed through reform.

**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.**

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.

#### A wider range of credentials

The VBA would welcome the inclusion of shorter form qualifications through the introduction of more skill sets and short courses. Although we still feel that qualifications are 'king' – shorter courses could enable persons who are working unlawfully because they do not hold the relevant qualifications to meet the requirements to become registered. Another gap not adequately addressed currently are persons who enter Australia on occupational visas, who do not have knowledge of Australian standards and code for their industry. These people often have excellent 'hand skills' in their trade, but there is limited educational pathways to obtain knowledge of Australian standards. In addition, some trades, such as plumbing have licencing that requires completion of units within the Certificate IV Plumbing qualification but do not require the full qualification. Formalised skills sets (and state / federal funding) may would address issues so that trades like plumbing can more easily seek out educational requirements.

#### The treatment of enterprise and social skills could be clarified in the AQF

The skills set out in Table 1 on page 19 are an excellent goal and sit naturally within Secondary Schooling. However, inclusion of all as standards in VET courses may reduce some persons access to education or disadvantage them. For example, those who fall on the autism spectrum may be fully capable of undertaking education in their chosen field but may have difficulty with learning agility, adaptability and resilience. This is true of those with learning difficulties or other issues which may impact a student such as dyslexia, anxiety and depression. Some of these skills fall outside of competency based assessment for VET courses and for higher education courses would be difficult to assess academically.

#### Volume of Learning

The VBA feels that volume of learning is valuable and should be expressed in both hours and calendar time. We would suggest weeks or months. Removing a calendar timeframe may have unintended consequences with some providers pushing intense hours within a short timeframe. We also think that the Certificate III hours need to be reviewed. There is a substantial difference in hours required between trade and non-trade courses. These should be expressed separately. Some certificate III non trade courses are simply do not require 12 months of learning for the majority of learners. Others need substantially more time. We also agree with ASQA in regards that volume of learning should be a guide with the words 'for new learners'.

## AQF Issuance Policy

It is our experience as a regulator that most TAFEs do not follow the issuance policy. Regulators who prescribed units / subjects must review the credentials provided to students. Students are given a variety of documents and are often inconsistent within cohorts of the same students. For example, it is not unusual for a student to be issued an 'Academic transcript' which outlines their assessment outcomes. This makes it incredibly difficult for regulators to interpret whether a unit / subject has been satisfactorily completed or not.

We would like to see an enhancement to all qualifications to include:

- Course commencement date (already reported in Victoria through the AVETMISS reporting standards)
- Course end date (as it is often difficult for us to understand why an RTO has issued a qualification up to six years after a course has superseded)
- Issue date
- Reissue date
- And for VET courses, we would like to see units grouped by core units and electives (and where elective groups exist, what the elective group is) – this could also be achieved through the requirement of a letter outlining this for trade qualifications.
- Considering changing the name of 'Statement of Attainment' and 'Record of Results' Change the name of Record of Results – to 'Subject Completion Statement' and 'Qualification Subject Completion Statement'
- The details required for units on a Record of Results be included for Statements of Attainment (eg. Date, type of completion)

Other issues that regulators face is verifying the validity of qualifications issued by providers. In the last 12 months, more than one occurrence of fake credentials entering the market has occurred. We note that some providers such as RMIT provide online verification services. However, many providers charge a fee (with some as high as \$70) and up to a 10 business day timeframe to verify qualifications. This has significant impact on regulators who must verify qualifications. Perhaps the accessibility of the USI register (which is not currently available to state and territory occupational licencing bodies) could be expanded to allow for occupational licencing body access.

## Other

### RPL

The VBA acknowledges that RPL conducted appropriately is a good pathway for many students. However, there are many issues with it. We acknowledge that recognition of prior learning issues is a really a regulatory issue. We have provided feedback to ASQA regarding issues that we see.

However, we feel that the AQF review could consider how to reduce issues associated with RPL. As a regulator, we see plumbing and building applicants who have undertaken qualifications via RPL in unusually short time frames. For example, a number of RTOs and education brokers advertise obtaining Certificate III trade level courses such as carpentry and plumbing within 2 weeks via RPL. We have seen Diploma of Building qualifications being advertised as being obtained within 4 days.

We also see persons that obtain qualifications via RPL that we would not normally expect that they would be eligible to undertake RPL for. For example, one applicant who had never worked as a plumber, was not yet registered as a plumber and had never run a business was given his Certificate IV in Plumbing less than three weeks after he completed his Certificate III in Plumbing. Both qualifications were completed via RPL in a state that the applicant had never lived or worked in. His application to us suggested that he had worked in Victoria during the period that he undertook these qualifications via RPL. We have contacted some applicants to understand how these qualifications are being completed. They have advised us that the RPL process consisted of phone calls and photos being sent to the provider. Whilst we understand that these issues are regulatory in nature (and we have passed intelligence to ASQA about these particular RTOs), we would like to see guidance about RPL included in Training Packages. For example, a person who would be eligible for RPL in the Certificate IV in Plumbing would be expected to be a registered / licenced plumber, and / or have owned a business or worked in a family plumbing business etc.

This also has significant impact with mutual recognition issues that regulators around the country are facing. In Victoria, many regulators (including the VBA, ESV, EPA etc) are finding that applicants seek RPL in another state, register in a state that requires only a certificate and then bypasses the quality assurance process that many Victorian Regulators have in place. We are forced to register persons that we know may not have sufficient skills as a result of poor RPL practices. We have had discussions with gas, plumbing and building regulators in WA, TAS, Qld who have also expressed concerns and frustrations with Mutual Recognition issues relating to poor RPL practices.

### Training.gov. au (TGA) website

The TGA website has significant gaps in it. Many training packages have been removed and are no longer available. Regulators need to refer to older training packages when applicants present with older qualifications. In some cases, there is almost no information available about certain qualifications. We feel strongly that all training package information must be restored and maintained on this central registrar. This should also include companion guides.

We would also like to see a similar central register for Higher Providers and Higher Ed qualifications. We would like to see a central registrar of all Higher Ed handbooks. Again, this is for reference for applicants presenting with older qualifications. It is often difficult to identify whether we could consider an older qualification equivalent or partially equivalent when information is not readily available online.