



Australian Council of Professions

The Unifying Alliance of Professional Associations in Australia

Australian Council of Professions Submission into the Discussion Paper – December 2018 – on the Review of the Australian Qualifications Framework.

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This submission has been compiled with contributions from professional accreditation bodies involved in higher education course accreditation to assist the Australian Government Minister for Education as well as the Council of Australian Governments' (COAG) Education Council and its Industry and Skills Council in its review of the Australian Qualification Framework.



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About the Australian Council of Professions as the Submitting Entity

The Australian Council of Professions is the unifying voice of associations representing the professions. Professions Australia (PA) is a not-for-profit organisation comprised of professional membership bodies supported by other organisations that share in our vision of building and maintaining community confidence in all professionals. We represent over 20 professional associations, which in turn represent more than 420,000 professionals.

We are acknowledged by the community and governments as the *thought-leader* championing and advancing professional practice and ethics in the interest of the Professions, Professionals and Professionalism in Australia.

We have been the voice for the professions since 1971 and exist to be the guardian of professional practice enabling communities to have confidence in the standards and integrity of professionals.

This submission has been developed in a timeframe that has not enabled a comprehensive consultation process with PA's full membership. Therefore, the views expressed are not representative of all members.

PA welcomes the opportunity to continue to support the Expert Panel to implement the outcomes.



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Introduction

The Australian Government Minister for Education as well as the Council of Australian Governments' (COAG) Education Council and its Industry and Skills Council and the Australian Council of Professions (PA) share the same overall objectives: to ensure that Australian higher education providers continue to deliver high quality courses to the benefit of students and employers; and to enhance the reputation of Australian institutions in order to sustain and grow Australia's education export industry and last but not least, maintaining the public interest by protecting the public through appropriate education and training of professionals.

The Discussion Paper – December 2018 acknowledges that since the Australian Qualifications Framework was last reviewed, national regulators for the VET and higher education sectors have been established and are underpinned by national quality standards in both sectors. New and improved ways of teaching, learning and assessment have been developed and there are ongoing increases in educational attainment. There is growing interest in, and renewed support for, a more coherent tertiary sector.

The nature of the workplace is changing, a new world is emerging which has important interfaces with traditional qualifications and institutions and employees may require more reskilling or upskilling, people want faster, cheaper, self-directed and on-demand learning. Employers prefer shorter, sharper education and training to supplement a full qualification like a Certificate III or a Bachelor Degree. There is a need to better understand how post-secondary education is transforming learning.

Professions Australia, the alliance of more than 20 professional bodies, represents over 400,000 professionals across the country, and has been working with higher education providers since 2007. This has enabled sharing of good practice as well as the development of significant statements and guidelines.

While the Expert Panel for the Review of the Australian Qualifications Framework is to be commended for its engagement with industry and its recent consultation session to consider this Discussion Paper, the Australian Qualifications Framework has not been reviewed in seven years. This Review and the subsequent implementation plan, can only be the start. The next review of the Australian Qualification Framework cannot wait another seven years. In fact, this Review provides an opportunity for the Australian Qualification Framework to continuously evolve.

It is also essential that this Review recognises and includes the role of traditional and non-traditional providers (including employers and professional bodies) and enables the opportunity to introduce a level of flexibility into the AQF that has not been there previously.

It was stated in a presentation at the recent Australian Council of Professions' National Summit on Micro-Credentials that the world has never changed so fast but that it will never change this slowly again.

Given the speed of change in work environments and employers' demands for increased employee learning outcomes, there is considerable pressure on education providers to meet this demand. Therefore, it is essential that the Australian Qualifications Framework equally keeps pace with this demand and continues to meet its objectives.



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Areas for Possible Change

A wider range of credentials could be included in the AQF

The Review proposed the following possible approaches:

- Include shorter form credentials in the AQF.
- Use the existing criteria for adding a qualification type to the AQF, possibly adapted for shorter form study, to determine whether shorter form credential types should be added to the AQF.
- Align shorter form credential types to AQF levels by assigning them across a number of applicable AQF levels.
- Determine what groupings of shorter form credentials are required and create them as credential types in the AQF.
- To help to aggregate shorter form credentials into qualifications, create a shorter form credential type that is defined by its link to a qualification type.

Whilst we agree with the inclusion of a wider range of credentials in the AQF, creating shorter form credentials as credential *types* risks narrowing and boxing allowable credentials and thereby stifling innovation.

Furthermore, shorter form credentials should link to an AQF *level* and not *qualification type*. That would only serve to exacerbate current frictions.

Professions Australia members are already exploring the opportunities presented by micro-credentials to increase the alignment between VET and higher education course content and employer needs. Our concern is to ensure that micro-credentials maintain quality standards and the approaches described in the Discussion Paper mirror our aims.

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

The Review proposed the following approaches:

- Specify that social and enterprise skills in AQF qualifications should be able to be:
 - taught in the context of the qualification's core content
 - acquired through the process of teaching and learning
 - assessed and reported in ways that are fair, valid and reliable.
- Expand the list of enterprise and social skills included in the AQF and provide guidance or advice about delivering them through various qualifications (but do not include these skills as a taxonomy).



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We don't agree that they need to be taught in the context of a *qualification's core content* - capabilities can be learned without being taught and there are other contexts that are just as relevant, such as workplaces.

We don't agree that they need to be acquired through a process of *teaching* and learning for the reasons outlined above.

We agree that they need to be assessed and reported in ways that are fair, valid and reliable and that the AQF could usefully provide guidance.

We disagree that a list would be wise as the importance of different social and enterprise skills has changed over time and will continue to change.

AQF taxonomies and levels

The Review proposed the following approaches:

- Use AQF levels only to describe knowledge and skills and their application, and provide a description of each qualification type that is linked to levels.
- Review the application of knowledge and skills domain of the AQF taxonomy and how it should be applied across the AQF levels.
- Revise descriptors to simplify them and ensure clear distinctions between levels.

While we largely agree with the approaches, the Expert Panel indicated that it is unlikely to deal with the dual sector qualification types in Levels 5, 6 and 8 in this Review. It is recommended that this matter is not forgotten and that the Expert Panel continue discussion with industry.

Senior secondary school certificates

The Review proposed the following approach:

Revise the SSCE descriptor to recognise that the knowledge and skills acquired in the SSCE can be at a broad range of AQF levels and result in multiple pathways.

As the Expert Panel indicated that their approach has been broadly supported, we agree with this approach.

Volume of Learning

The Review proposed the following approaches:



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- To continue to provide guidance on the breadth and depth of a qualification, change the volume of learning unit of measurement from years to hours.
- To provide a common baseline for volume of learning, base the number of hours for a qualification type on the needs of a new learner.
- To help facilitate pathways between levels and qualifications, develop an hours-based credit point system in the AQF that may be voluntarily referenced by providers.
- To provide a common baseline for credit points, base the number of points for a qualification type on the needs of a new learner.

We recommend that this review also needs to ensure that the Australian Qualification Framework is relevant to the international marketplace.

What also matters is credit *and competency-based* measures of learning. The value of competency-based measures is that they are output, not input (time) focused and recognise that people have different starting points, learn at different rates, and pedagogical innovations will continue to impact the speed of learning. A useful reference on this point is <https://www.luminafoundation.org/files/resources/currency-of-he.pdf>

The Expert Panel's attention is drawn to AQF Level 8, which contains the Bachelor Degree, Graduate Certificate and Graduate Diploma. It can be confusing for educators and students when professional bodies accredit the Graduate Diploma, for example, but are unable to accredit the Graduate Certificate, because it does not include the required body of knowledge for that profession.



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Appendix A: Contributors

A series of meetings with the Expert Panel and PA Members informed this document, including:

- 7th March 2019 – Australian Council of Professions' National Summit on Micro-Credentials and Accreditation
- 8th March 2019 – consultation with industry and the Expert Panel

Subject Matter Expertise has been provided by the following:

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