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

Joann Pyne, Chief Academic Officer

Respondent organisation (where relevant)

TAFE Queensland

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

The discussion paper identified a range of areas the current AQF is no longer fit for purpose:

a) Does not recognise a wide range of credentials.

b) Does not adequately represent the enterprise and social skills that employers regard as important.

c) Contains duplication of descriptors at AQF Level and Qualification type

d) Current AQF classifications of knowledge and skills are unclear, application is dependent on context

e) Some qualification types do not confirm to their AQF level descriptors eg trade and non-trade Certificate III qualifications

f) AQF descriptors are unclear

g) Secondary school graduates have knowledge and skills from multiple AQF levels

h) Volume of learning is often not reflective of qualification requirements
TAFE Queensland agrees that the AQF could be improved in the areas listed above. The vocational education areas that TAFE Queensland agrees are critically important are (a), (b), (e), (g) and (h) as highlighted.

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

a) Wider range of credentials be included in the AQF

TAFE Queensland agrees that there is increasing demand for micro-credentials and flexible delivery options.

- Skill sets – By linking some skill sets to qualifications, a learner could build up to a full qualification by completing additional specific skill sets on top of the core units, or more readily change specialisation by completing additional skill sets.
- Incomplete qualifications – are a subset of an existing AQF qualification and are already recognised using a ‘Statement of Attainment’.
- Short courses (in VET) – are based on accredited units of competency and termed a ‘course in (subject)’ but they are also relevant to curriculum based higher education short courses. Courses titled ‘Course in….’ are accredited by a VET regulator and would meet the proposed criteria for inclusion in the AQF in the same way that skill sets do.

TAFE Queensland agrees that the demand for and provision of micro-credentials is increasing in Australia. Micro-credentials are unregulated and, as a credential type, they do not have a relationship to existing AQF qualifications.

TAFE Queensland believes that aggregating shorter form credentials into qualifications will allow learners to access more programs when they are needed, and would also allow those short courses to be linked to the relevant AQF level. In VET it is critical to link any short courses to competencies so that students can successfully build their “skills passport”. This also makes transitions between HE and VET sectors manageable. In higher education these mechanisms are not as easily implemented due to the inconsistencies between institutions. If work is undertaken to aggregate shorter credentials in HE, care should be given to ensure any shorter credentials do not replicate existing, industry supported, short courses in VET.

b) Inclusion of enterprise and social skills

TAFE Queensland believes this is a critical area for skills development. This is evidenced by research we have undertaken with CSIRO. The demand for communication skills were highest in occupations requiring active listening, negotiation and service, orientation skills. Writing and coordination skills and speaking and instructing skills will also highly desirable.

The demand for digital literacy skills in now ubiquitous across all occupational areas.

TAFE Queensland supports the expansion of the list of enterprise and social skills included in the AQF and providing guidance and advice on the delivery of these skills through various qualifications.

Currently the AQF does not represent, identify or evidence the development of transferable skills including enterprise, digital, transferable and social skills outside the core requirements of the training packages. With young people likely to have an average of 17 jobs, the need to identify, define and evidence transferable skills
gained through formal or informal training is integral to career success. This could also be used as evidence to gain employment during training, rather than simply stating they are part way through a training program, students could identify and evidence the enterprise skills they have gained as well as the core

e) Remove duplication of descriptions and review the application of knowledge and skills, providing clear distinctions between levels.

TAFE Queensland supports a reclassification review of the application of knowledge and skills, particularly in the current trade Certificate III qualifications. TAFE Queensland acknowledges that this is an issue relating to Training Package formation rather than the AQF but wants to highlight this issue as part of the review.

Currently a fully qualified, licensed, professional tradesperson holds a qualification at a level below where a recent school leaver, first-year university student is studying. TAFE Queensland strongly supports the view expressed in the discussion paper that some trade graduates have skills, knowledge, and decision-making more closely aligned to Level 5.

f) Senior secondary school certificates

The SSCE currently recognised the skills and knowledge acquired in the VET sector.

h) Volume of learning

TAFE Queensland currently negotiates articulation agreements with a range of higher education providers. This process is often cumbersome and time consuming, with the eventual result fairly consistent across all Queensland higher education providers. The use of a points system would provide a more transparent and effective way to manage this process.

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.

TAFE Queensland agrees that the AQF could be improved in a number of areas. The critical issues for vocational education are focused in the following critical areas.

- The recognition of a wider range of short form credentials.
- Representing enterprise and social skills more completely in the AQF.
- Addressing Volume of learning across qualifications through the recognition of hours or a point system.

Other