

18 March 2019

Professor Peter Noonan
Chair
Australian Qualifications Framework Review Panel
Department of Education and Training

Email: AQFReview@education.gov.au

Dear Professor Noonan

The University of Queensland welcomes the opportunity to make this submission in response to the *Review of the Australian Qualifications Framework* discussion paper.

Any changes to the Australian Qualifications Framework (AQF) should reinforce the sector's high standards, commitment to excellence and quality assurance, and focus on student and graduate outcomes. It is also critical that any changes are consistent with and aligned to any changes to Provider Category Standards (PCS). The outcomes of the AQF Review therefore need to be considered alongside the outcomes of the PCS Review.

The pace of change facing the higher education sector requires a clear and transparent AQF with high degrees of utility to students, employers, providers and the community. The global nature of work also requires that the AQF should be easily interpreted by other educational jurisdictions. It is possible that such an AQF will require an even greater focus on quality assurance.

There are a number of areas where we feel the current AQF presents barriers to agility, flexibility, transparency and portability across international boundaries:

- Defining typical durations of program length in terms of years and months is restrictive;
- Having multiple qualifications at the same AQF level is confusing for everyone, especially at levels 6 and 8; and
- Non-alignment with international qualifications presents problems for some Australian students wishing to study overseas and overseas students wishing to have an Australian qualification recognized in their home country. At UQ, we would contemplate the removal of Honours as a separate program of study and a shift to Masters programs as the route to Doctoral study.

We feel that any recommendations arising from the AQF Review should

- be learner-focussed;
- clarify distinctions and complementarities between higher education and vocational education;
- support a sector-wide vision of pathways for lifelong learning within and across post-secondary education irrespective of differences in governance, culture and funding of individual providers;
- create an appropriate framework for innovation and diversity in relation to types of qualifications and flexible delivery arrangements, noting the volume of learning, while important, may not always be the most useful marker;
- ensure flexibility of pathways across and within the sector so that students are provided more certainty/clarity in terms of multiple career pathways and opportunities for life-long learning;
- encourage/embed opportunities to work with the secondary education sector to ensure students are appropriately prepared for, and make informed choices about, these pathways;
- encourage/embed opportunities for vocational education and higher education to engage more collaboratively; and
- maximise alignment with international qualification frameworks.

We know that the nature of work is changing and will have a profound influence on what, when and how students study. It is likely that the 'perpetual student' will become a necessity rather than an epithet for a lazy or wealthy person. To accommodate this, UQ along with many other Australian and international universities are offering MOOCs, SPOCs, MicroMasters, micro credentials and digital badges which are not presently situated in the AQF. The review ought to give some careful consideration to these new offerings which fall short of a traditional program of study. In our view, this is probably the most challenging task facing the review panel.

In a similar vein, the agility required from the work force of the future will require greater flexibility from Universities. The AQF's typical durations for programs of study may be restrictive and discourage innovative, intensive and non-linear progression from undergraduate to master level study for example.

This last point should be an important consideration for the Review. We would suggest that the review panel consider a system of credit point linked to notional learning hours rather than typical duration of a program. Such a system would allow students to complete study short of a program and 'stack' the credits towards a program level qualification.

A student's ability to complete a short form credential successfully might also support improving retention and success rates in longer-term qualifications. This may also align with pathways into higher education, for example, for international students choosing to study online as a means of qualifying for entry to a formal, onshore qualification.

If the AQF Review is considering whether to assign Senior Secondary Certificate of Education (SSCE) to an AQF level (or levels), it is critically important that this does not in any way offer a disincentive to students to graduate from High School with as many further learning options as possible.

The AQF Review should also consider what is important to students when making decisions about what and where to study. As graduates become more global in their outlook and employment, being able to benchmark to international qualifications will become increasingly important. In this respect, UQ would encourage the review to be bold and re-consider the almost unique position of the Australian Honours degree.

UQ would also encourage the Review to clarify consideration of the more ambiguous areas to ensure consistency across the AQF, for example;

- Recognition and explanation of distinctive qualifications at the same AQF level - for example, Honours, Graduate Certificate and Graduate Diploma, all at AQF Level 8 or the Advanced Diploma and Associate Degree at level 6;
- Institutional differences in interpretation and implementation of the typical volume of learning for specific qualifications, most notably in relation to Masters by coursework. Implementation of volume of learning 'for deepening purposes' and 'for broadening purposes' has not been straightforward; and
- Sub-degree qualifications (such as undergraduate diplomas at AQF Level 5) that comprise subjects designed for an AQF level 7 (bachelor) program. This might become particularly important if the revised AQF moves to give recognition to additional types of short-form credentials nested within, for example, the bachelor degree.

In changing the AQF, there may also be impacts on accreditation requirements. In its response to the *Professional accreditation in higher education – Implementation of recommendations from the Higher Education Standards Panel*, UQ noted the complementary roles of professional accreditation bodies and universities, and reiterated its support of changes that reduce the administration load of accreditation requirements and opportunities to expedite and simplify accreditation processes.

I trust these few comments will be useful to the Review Panel's deliberations. If you require any further information or clarification, please contact my office (email dvca.office@uq.edu.au or telephone 07 334 67754).

Yours sincerely

Joanne H. Wright

Professor Joanne Wright
Deputy Vice-Chancellor (Academic)