



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

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

In a general sense, the Australian Qualifications Framework is fit for purpose, however when measured against its seven stated aims, it perhaps appears less so. In a general sense, levels of qualifications are appropriate and align most closely with the international higher education qualifications as seen in the United Kingdom, Canada and Europe most closely, and, to a lesser degree, the United States. When measured however, against its stated aims, the Framework appears less fit for purpose. These points are elaborated upon in other sections of this submission, but in brief:

| | AQF Stated Purpose | Fit for Purpose? | Commentary |
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| 1 | To accommodate the diversity of purposes of Australian education and training now and into the future | YES BUT | The Framework manifestly accommodates diversity of institutional purposes and missions. This has been borne out by increases in the |

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| | | | diversity of the sector/s. However, the Framework is clearly not future-proofed or appropriate for today's (and emerging) learners' needs. The discussion paper makes this clear. |
| 2 | To contribute to national economic performance by supporting contemporary, relevant and nationally consistent qualification outcomes which build confidence in qualifications | NO | Not according to employers. Much of the material is the Discussion Paper points this out quite starkly. |
| 3 | To support the development and maintenance of pathways which provide access to qualifications and assist people to move easily and readily between different education and training sectors and between those sectors and the labour market. | YES, BUT | As the authors say, the Australian Qualification Framework Pathways Policy requires revision. We agree that the potential inclusion of enterprise and social skills will help with work-readiness (see below). |
| 4 | To support individuals' lifelong learning goals by providing the basis for individuals to progress through education and training and gain recognition for their prior learning and experiences. | YES, BUT | The Framework does encourage lifelong learning; however, the sector would benefit from an agreed credit system both <i>between</i> the education and training sectors and <i>between providers</i> within those sectors (see below). |
| 5 | To underpin national regulatory and quality assurance arrangements for education and training. | YES, BUT | The Framework clearly does underpin regulation; however, as the authors state the Bradley Review aim of a single regulator and a single set of standards has not been realised. |
| 6 | To support and enhance the national and international mobility of graduates and workers through increased recognition of the value and comparability of Australian qualifications. | NO | Much of the material presented is at pains to show that the Framework has not achieved this goal. |
| 7 | To enable the alignment of the AQF with international qualifications frameworks. | NO | The Framework has not achieved this – witness the difficulties experienced in |

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| | <p>assessing admission applications from overseas graduates into Australian HDR programs.</p> |
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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.

2.1 SHORTER-FORM CREDENTIALS

We agree that it is important that any revised Framework must continue to recognise the important role of full qualifications in providing a broad, foundation education in vocations and disciplines. Shorter-form credentials should not be included at the expense of full qualifications.

We also strongly support the inclusions and recognition of qualifications that are designed to allow those who do not complete them to exit with a recognised AQF qualification (nested qualifications). This is essential to the functioning of the Framework.

Possible approach 1: Include shorter-form credentials in the AQF

As the authors point out, there is potential to include shorter-form credentials in the Australian Qualifications Framework by expanding the 10 vertical level horizontally.¹ But, as is also pointed out, this would require considerable effort on the part of those undertaking the revisions. The costs and benefits of doing so will have to be carefully weighed.

Any recognition and granting of credit towards formal qualifications for in-service or informal learning, or micro-credentials, must be done in a consistent manner. Only then will outcomes for students be equitable. Merely including shorter-form credentials in the Framework will not necessarily lead to this outcome. Put simply, there is much work to do if we go down this road, and we must decide whether or not the effort is worthwhile, given the intended outcome.

Obviously, if they are included they should fall under normalised regulatory and quality requirements. But do they deserve them and how much effort and red tape will be generated here?

We agree that some form of recognition and guidance around shorter-form credentials is badly needed. At minimum, a first step acknowledgment, such as has occurred in New Zealand, would encourage providers to place greater emphasis on using learning outcomes to categories and differentiate shorter-form credentials. This is particularly salient if formal recognition of micro-credentials engenders a funding wedge between those offerings which

¹ The examples of shorter-form credentials listed in the Discussion paper are Group 1: skill sets, short courses (in VET these are based on accredited units of competency and termed a 'course in (subject)', and incomplete qualifications; Group 2: enabling and foundation courses (that are focussed on university admission or the provision of core skills such as numeracy and literacy), and Massive Open Online Courses (MOOCs) that provide credit toward AQF qualifications; Group 3: short courses (non-curriculum-based higher education and VET short courses); micro-credentials; MOOCs (that do not provide credit to existing qualifications), and professional and vendor courses such as finance and information technology courses.

include assessment (future publicly funded based on productivity criteria) and those that are instruction only (full fee for service).

The authors argue that including shorter-form qualifications will mean that the aims of the Framework are potentially actually met (e.g. the chance to give providers more confidence and capacity to grant credit for those credentials towards full qualification; the chance that their relationship to existing Australian qualifications is transparent; or the chance that these credentials can be recognised in Australia and internationally; the chance that the Framework then responds to employers and workers' desires – namely, credentials that are affordable and timely, that can help people to retrain and upskill as the workplace changes.

What actually is the likelihood that this plethora of benefits will flow? More importantly, can these benefits be realised in another way?

We think they can; through the development of guidelines for the evaluation and inclusion of shorter-form credentials as *contributors to learning outcomes already outlined in the Framework*. Similarly, guidelines and framework for the design and specification of shorter-form credentials that are aligned with current AQF levels would be most useful. Assurance of skills and learning outcomes will be central to this.

To achieve this (the recognition of shorter-form credentials as RPL) it will probably be necessary to be finer grained in the descriptions of learning outcomes for courses and units and recognise different forms of assessment. This will assist with issues around comparability at levels, comparative value of qualifications (though qualitative experiences may vary widely), complexity of learning, quality assurance and some of the rest. Naming up aggregated qualifications is not needed. Exit qualifications would probably not change (a graduate would list the award degree or certificate completed with the institution and any other shorter-form credentials that have been achieved along the way.)

Possible approach 2: 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

As we have said, we are of the view that guidance around shorter-form credentials could supplant the need to actually include these in the Framework. However, if they are to be included it would be optimal if such credentials fulfilled the criteria already in place for adding qualification types to the Framework. But, as the authors point out, not all forms of shorter-form credentials currently meet these criteria. The options here, are to 1) not include them at all on this basis, or 2) to modify the criteria themselves. Again, a cost benefit analysis is required. The seven criteria that a qualification type must currently meet in order to be included are:

- **The qualification type must be quality-assured under government approved standards.** If shorter-form credentials are assigned new AQF levels, new regulatory processes will be required for some kinds of shorter-form credentials. The burden may be considered too great. It is the case that shorter-form credentials that are delivered by registered providers will automatically be subject to a quality assurance regime. However, a lot is riding here on the notion of "being aligned." The shorter-form credential types do not warrant new levels of their own but will be 'aligned' to existing levels. This notion of alignment requires more explanation.

- **The qualification type must be able to be accredited by an authority authorised under legislation.** This also depends somewhat on a fuller characterisation of 'alignment'. It may be that the shorter-form credential type 'inherits' the accreditation enjoyed by its parent type. Arguably, it would be more rigorous to require that the shorter-form credential undergoes separate accreditation, but in the same manner as its parent qualification type. We note that New Zealand has kept shorter-form credentials outside of its Framework but has required accreditation.
- **The qualification type must be able to be described according to the AQF descriptions of learning outcomes** (knowledge, skills, the application of knowledge and skills and generic learning outcomes). This could be achieved. Shorter-form credentialled could be described according to the three classifications of learning outcomes currently used the Framework.
- **The qualification type must be able to be located at an existing AQF level.** This depends on whether or not new qualification levels are being countenanced to accommodate shorter-form credentials (in which case the criteria is ruled out by definition), or whether the new shorter-form qualification types will be tied to the existing levels. If so, then this criterion can be met.
- **The qualification type must have clear pathways within the AQF.** This is not inconceivable but will be difficult and most likely highly contested. It will require substantial revision of the AQF Pathways Policy (which is already planned). If shorter-form credential types are to be included, but tied to existing Framework levels, then pathways can be specified relatively easily. The shorter-form credential type could 'piggy back' on the pathways already defined for its 'parent' type. If actual new levels are included, new pathways will need to be articulated – which will involve greater effort.
- **The qualification type must not duplicate an existing AQF level.** Shorter-form credentials by definition duplicate other AQF levels, but they may form a sub-set of one. As long as the two do not match like-for-like there will be no duplication.
- **The qualification type must meet a defined industry, professional or community need.** This can be achieved, and is, in fact the reason why this debate is occurring.

Possible approach 3: Align shorter-form credential types to AQF levels by assigning them across a number of applicable AQF levels.

The authors state "Shorter form credentials could be included in the AQF using a matrix that includes the 10 AQF levels. Existing AQF qualifications would be listed against the levels. Alongside the existing qualifications, shorter form credential types would be listed horizontally and aligned against a number of appropriate AQF levels. The complexity of the credential type would provide the basis of the level of alignment rather than its length or whether it is from the VET or higher education sector." The notion of 'complexity' is doing most of the heavy lifting here and would need carefully definition.

Also, there would need to be some delineation of where it makes sense to place/align a shorter-form credential type and where it does not. The suggestion is that a shorter-form credential type, say, for example, MOOCs (that provide credit to existing qualifications), might sit alongside several different qualifications – but which of the existing qualifications and why not all of them? Without sound underlying and agreed principles, such decisions may be seen as being unacceptably arbitrary.

Possible approach 4: Determine what groupings of shorter-form credentials are required and create them as credential types in the AQF.

As the authors note, a feature of the Danish, Scottish, and Irish systems is that they group shorter-form credentials according to their purpose. While we are of the view that this is the most appropriate way to group such qualifications (by, for example a defined set of purposes: preparation for work; preparation for further study; skills and knowledge extension building on a previous award; and general interest), we are also of the view that such a purpose or intention-driven classification of qualifications would be usefully extended to *all qualifications*.

For example, a clearer demarcation of Masters by Coursework and Masters by Research (with a coursework component) might be made through considering the differences between them in purpose or intent. It would surely be less than optimal to create a Framework within which one set of qualification types is arranged according to *outputs* (learning outcomes) and the other is arranged according to *inputs* (purposes).

2.2 ENTERPRISE AND SOCIAL SKILLS

The authors suggest that social and enterprise skills should be acquired and assessed in the context of the requirements of individual qualifications and, as such, the AQF should not prescribe a universal or mandatory set of social and enterprise skills across qualifications.

We agree with the authors on this. For, while it is the case that there is more demand for professional and technical skills and interpersonal and creative skills, enterprise and social skills are not specific to any job role. Also there is no, one accepted list of enterprise and social skills and many are not new, they should be included in any conception of "generic skills" and in fact already are. It is not as though enterprise and social skills are missing from the Framework - the Framework currently sets out certain non-discipline specific generic skills that students can acquire through learning that include some enterprise and social skills.

We also agree that, because enterprise and social skills appear to be context dependent, it is likely not possible or appropriate to present them in a taxonomy that applies to all qualifications, and for them to be learned and assessed at different levels. However, this does beg the question as to how this is supposed to work for generic skills more broadly?

Possible approach 1: 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; and assessed and reported in ways that are fair, valid and reliable.

If enterprise and social skills are to be explicitly named up in the Framework, clearly these criteria must apply, but as has been said, there are no strong arguments presented for explicit separation of enterprise and social skills from other generic/transferable skills.

Possible approach 2: 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).

We agree that the time is right to replace the current limited definition of generic skills in the AQF with a broader, more current list of enterprise and social skills, noting that the focus

on different enterprise and social skills may change over time. Even if you expand the list, the application of enterprise and social skills, *like all generic skills* will be dependent on the specific discipline or vocational *field* (context) in which they are applied.

We agree that guidance as to how specific enterprise and social skills can be applied in different qualifications – having regard to the purpose and discipline of the qualification and the primary learner cohort for whom the qualification is intended should be provided.

A more explicit granular definition of these skills associated with qualification types is a logical progression and will enable a greater understanding of the way in which these skills can be developed across the tertiary sector.

2.3 TAXONOMIES AND LEVELS

Possible approach 1: 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

As the authors point out, the Framework currently includes descriptors of knowledge and skills *and their application* for both levels and qualification types. This means that sometimes the descriptors for levels and qualification types repeat or contradict each other.

We are of the view that the most expedient way to overcome this problem is to follow the example of other countries and use *level descriptors*, rather than the *descriptors for qualification types*, to outline knowledge and skills. Like them, we could then use the qualification type descriptors to describe other qualities that apply to qualification types only, such as credit arrangements. This would mean that descriptors of knowledge and skills would be applied to the level only and additional qualification type descriptors will describe other qualities (as suggested, probably purpose, volume of learning, pathways, responsibility for accreditation and development and authority to issue the qualification.)

The authors present an argument to the contrary such that descriptors for qualification types can help with recognition of Australian qualifications overseas. This is certainly the case with regards to qualification types which are not differentiated by level descriptor alone (for example Bachelor Honours and a Graduate Certificate which are both located at Level 8.

We do not find this argument persuasive. Other ways can be found to describe qualifications such that they are distinguishable from each other – without having to outline different levels of knowledge and skills (minimum content requirements could be one).

But note – once the Level 8 qualification types are differentiated from one another, it is difficult to see why they do not deserve to *actually* be at different levels. If they are placed at the same level – but are differentiated through other qualities, why not just assign a different level?

Possible approach 2: Review the application of knowledge and skills domain of the AQF taxonomy and how it should be applied across the AQF levels

The authors challenge the assumption that the *application* of skills and knowledge rises in direct alignment with the *level* of skills and knowledge attained – “is it reasonable to assume that all Certificate III graduates, including qualified tradespeople, only apply their skills and knowledge ‘by taking limited responsibility in known and stable contexts within established parameters’ or that they take only ‘limited responsibility for the output of others’ as the AQF

currently suggests?"

The suggestion is that the application of knowledge and skills should be separated into a discrete domain which is less hierarchical in nature and which could be flexibly applied across different qualification types depending on their *purpose*. We agree with this suggestion. We also note that taking account of the purpose of qualification types does have the potential to at least partly remedy many of the issues raised in the discussion paper.

This would also go some way to ameliorate perceived biases and hierarchies between the qualification types and those who have them. Notions of progression and hierarchy around application of knowledge and skills, autonomy and so on imply that the 'lower' levels require less autonomy and responsibility, when this is manifestly not the case.

Reformers should be careful, however that application of knowledge and skills becomes so broadly defined – flattened out if you will across the qualification levels and types, that it begins to lose all meaning.

Possible approach 3: Revise descriptors to simplify them and ensure clear distinctions between levels

We support the review of descriptors to ensure clear distinctions between the levels. This is surely what the Framework is intended to do.

The authors outline a possible solution through reference to the requirement that each qualification type has a minimum amount of content at a certain level (New Zealand). In our view, this is the intuitive reading that most people actually apply to the volume of learning measure, but here the idea of the "size" of a qualification is expressed as a minimum number of credit points form a certain level. This is a good approach, but for it to work the minimum thresholds of 'unit borrowing' across levels must be set out very clearly. This will be extremely difficult to achieve if a standardised credit points system is not introduced.

We make the following comments with regard to the specific level-based issues that are outlined:

- On the specific issue around distinguishing between the Level 8 (higher education) qualification types, we are of the view that Graduate Certificates and Graduate Diplomas at Level 8 are not of the same level of complexity as the Bachelor Honours year, which is also at Level 8. Again, the notion of *purpose* could be usefully employed here to make the distinction, either within Level 8 or to create a new level.
- The same comments apply to the issue around distinguishing the Level 9 qualification types (Masters by research and Masters by coursework). If they do differ in complexity as some claim (and they probably do), this is most likely due to the fact that they differ in *purpose*. The qualification types probably have many more differences than they do commonalities.
- On the specific issue around the fact that there are both VET and higher education qualification types at AQF Levels 5, 6 and 8, we are of the view that there should be a return to a distinction between VET and higher education qualification types at these levels. E.g. Level 5a (VET Diploma), Level 5b (Higher Ed Diploma), and so on. This would go some way to overcome issues such as credit transfer between Vet and Higher Education qualification types and the same level.

2.5 SENIOR SECONDARY SCHOOL CERTIFICATES

Possible approach 1: 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

Australian senior secondary certificates of education (SSCE) are in the AQF but are not assigned to an AQF level. The authors suggest an approach that recognises that learning outcomes vary across the SSCE and that trying to integrate the SSCE more directly into the AQF given its broad purpose and flexible structure is not possible. We agree that this is not possible due to the amount of variables at play, such as the type of SSCE, the subjects studied and the level of achievement gained.

The argument that if the SSCE is aligned to an AQF level or levels, it may prove easier for tertiary providers to make decisions about tertiary credit and RPL is not supported. Credit decisions should be made on assessment of the equivalence of learning outcomes achieved. Admission and entry level decisions should be made similarly. The arguments presented suggest that it is not preferable to assign the SSCE to any one level or to multiple levels.

Perhaps the SSCE should be characterised as not actually being assigned a level, but rather functioning as a pathway to the other levels (and sometimes on a subject-specific level). Each secondary institution might be provided an opportunity to self-assess their study programs (all variants) against a set of high-level learning outcomes and specify, publicly, what their programs achieve for their students and the range of pathways possible for students. These might be quite different for the various school and region. These assessments would need to be generic enough to indicate a level of learning and specific enough to indicate areas of strength and potential for specialisation. The links to potential pathways for employment and/or education would help the secondary schools and their students. Whether this is something that belongs in the Framework is debatable.

This section of the discussion paper highlights one of the challenges faced in interpreting the current Framework. The Framework's focus is the graduate of a particular qualification level. The outcome is that for nested qualifications, the entry-level requirements/ qualifications/ equivalencies are not addressed. For example, as identified, some students may undertake Cert I or II studies in their SSSC, and in some cases, many students undertake diploma or advanced diploma level study during their SSSC. Similarly, in combination, the volume of learning issues, and the discussion around the AQF Qualifications Pathways Policy discussion show that the relationship between different levels of study, particularly in the Level 1 to 5 space, could be better clarified.

The hierarchical nature of the AQF needs to be secondary to defining the *relationships* between each of the qualification types. For example, the level of differentiation between coursework, extension and research masters can be applied to other qualifications. This is most salient at Certificate IV, where some qualifications (i.e. construction) are dependent upon completion of a Certificate III trade (3 years) and others are an entry point, typically nested into a 1-1.5 year diploma program.

2.6 VOLUME OF LEARNING

Possible approach 1: Continue to provide guidance on the breadth and depth of a qualification, change the volume of learning unit of measurement from years to hours.

We agree that using years to measure volume of learning is becoming a problem as modes of delivery shift away from purely traditional classroom learning and semester-based courses to include online, blended and self-paced delivery, as well as trimester-based and accelerated modes of delivery.

We are of the opinion that the best way to address this, and other issues is the adoption hours as the unit of measurement for volume of learning *as the basis of a credit points system where credit points derive their value from a certain number of hours of study.*

Possible approach 2: Provide a common baseline for volume of learning, base the number of hours for a qualification type on the needs of a new learner.

We agree that more guidance and a common baseline should be provided as to what constitutes guided learning (and what does not). Guidance will also be needed if minimum thresholds of guided learning are to be set. Presumably 'classroom' will explicitly include the online environment. Does this really make any sense in a blended/fully online context? Only if 'classroom' includes the online environment explicitly. It should be noted that a move to using hours rather than years will not make specifying minimum thresholds of guided learning any easier.

As to the question of whether there should be a move from the volume of learning expected of the *new learner* as opposed to the current *typical learner* expectation, this may go to the heart of the genuine differences between the sectors.

We agree that this shift would work for the VET sector but are far less sure that it is appropriate in higher education, and particularly not at the 'higher' levels. This is perhaps one of the costs of attempting to build a single multisector framework. The new learner expectation makes sense in VET and entry-level qualifications, but not in the advanced level qualifications.

Possible approach 3: 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

The Review has identified two approaches for a national credit point system: 1) an optional system that is set out only in the AQF and to which providers can match their existing systems; and 2) a national system that is given effect through the AQF and sector standards and phased in over time.

We support the introduction of a national credit point system, but recognise the considerable effort that this entails. Perhaps the best option is to begin with an optional system, with a national agreement to transition to a national system in a given period of time.

The authors state "This approach also has implications for student pathways, as an optional AQF credit point system across both the VET and higher education sectors would express learning outcomes for all students in the same currency." We do not agree with this statement and would rather say that such a system would express *volume of learning* in the same currency – not *learning outcomes*. Credit transfer decisions are made on both volume of learning (however expressed) and comparability of learning outcomes (and therefore likelihood of student success). The two are related – but are not the same at all.

The development of a credit-based system which is underpinned by determinations of student learning volume (SVOL) would be a positive outcome for facilitating credit transfer

arrangements. To be successful, it would require the use of a validated activity-based model of learning design where volume is considered in parallel with learning outcomes.

Possible approach 4: To provide a common baseline for credit points, base the number of points for a qualification type on the needs of a new learner.

Despite what has been said above regarding the new learner/typical learner expectation distinction, it seems that the *new learner* expectation is the right measure to use to establish common baselines for credit points.

2.7 AQF POLICIES AND EXPLANATIONS

Possible approach 1: Revise the Pathways Policy as guidance, noting that primary responsibility for providing pathways sits with providers, training package developers and regulators.

As the authors recognise, a threshold issue for the Review is whether the AQF should continue to have a policy regarding pathways and credit, when it is also addressed in some aspects of sector provider standards and regulation. We are of the view that it should, as the standards are not always specific enough to provide adequate guidance.

We, like other providers find the AQF Pathways Policy very useful, particularly clause 2.1.10 which lists percentages for credit that providers should award when students transition from a Diploma, Advanced Diploma or Associate Degree to a Bachelor degree in a related area.

We would therefore argue for retaining the Policy. That said, it does require revision and we are of the view that it should be revised substantially and supplemented with the credit guidance mentioned in the discussion paper. Clearly the impact of any shift to standardised credit points (mandatory or optional) will need to be accounted for.

Leaving the Pathways Policy aside, we agree with the authors that specific guidance is required around the granting of credit for non-formal and informal learning, recognising that this is no simple task.

Possible approach 2: Develop a shared credit transfer register

It is a shame that the requirement that organisations that issue qualifications maintain public registers of their credit transfer and articulation agreements linked to the AQF Register, was never established. A shared credit transfer register, that includes precedents and explicitly references the Framework will help with this issue. The administrative burden for Government and providers is surely outweighed by the benefit to students.

Possible approach 3: Remove the AQF Qualifications Register Policy from the AQF

We agree that the anticipated utility of the AQF Qualifications Policy has been superseded by the establishment of the TEQSA National Register and training.gov.au and state and territory registers of SSCE qualifications, and that it should therefore be revoked.

Possible approach 4: Retain the AQF Qualification Type Addition and Removal Policy in the AQF

It goes without saying, given the current review, that the AQF Qualification Type Addition and Removal Policy should remain in place. But note the comments above about modifying its criteria in order that shorter-form credentials can be included. If that is what is decided.

The modification of this policy is the first order of business.

Possible approach 5: Consider whether the AQF Qualifications Issuance Policy should be retained in the AQF.

There is no issue per se with separate Qualifications Issuance Policies, provided that they do not contradict one another.

Possible approach 6: Remove from the AQF the Principles and Processes for the Alignment of the AQF with International Qualifications Frameworks and retain them as a Department of Education and Training Policy

The principles for referencing other qualifications frameworks outline the requirements that must be met prior to an international alignment between qualifications frameworks. The authors state that it is the Department's preference to make the principles and processes for alignment with international qualifications frameworks a departmental policy. We are of the view that provided that these principles and processes are visible both domestically and overseas, this proposal carries no disadvantage.

On the question raised about explanations/definitions and their availability, we are of the view that a consolidated, shared understanding is the best way forward. The regulatory bodies are quite advanced in definitional nuance now and the discussion paper itself includes an extremely useful glossary. The optimal situation would be if the regulators and the Department could issue a preferred set of definitions/glossary.

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.

As the authors state "the AQF *could* provide further support for a more coherent tertiary system, but funding and governance systems would need to be re-examined for the benefits of the AQF to be fully realised." As has been pointed out above, the results of contemporaneous reviews (on performance-based funding and the capping of places) are critical here – these things go hand in glove and the results of this review must take account the results of the others. Timing will be everything.

As the authors state "Decisions about Australia's qualification framework, pathways and granting of credit *should be separated from Federal funding consideration*. They should be – but let's be realistic. They can't be.

Given the admission that "changes to the AQF may have far-reaching impacts, including for industrial awards, migration rules and Australia's international education sector", we advocate moderate reform – that make sense for this country.

In terms of implementation (and assuming that short form credentials will be included) the question then becomes – how do we quality assure and accredit shorter-form credentials that are *not* regulated in the VET sector. There are a number of options here: 1) just don't; 2) expand the powers if ASQA; 3) don't actually include them – but 'align' them. We would argue that none of these options serve the needs of the sector, or of our students.