



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.

FEEDBACK FROM AUSTRALIAN CATHOLIC UNIVERSITY (ACU) MARCH 2019

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

The Australian Qualifications Framework (AQF) plays an important role in ensuring that there is: 1) a level of consistency in qualification levels and titles across the country; and 2) a recognised and consistent set of high standards in the design and delivery of tertiary education courses across education providers.

A major strength, and benefit, of the AQF is that it provides guidance on the substantive elements of a domestically and internationally recognised set of qualifications. These substantive elements are pedagogically relevant and measurable; for example, knowledge, skills and the volume of learning are all appropriate elements for regulation with respect to recognising and vetting different qualifications.

Furthermore, the AQF provides universities with a flexible structure that allows them to have an appropriate level of autonomy over their own quality assurance operations. For example, volume of learning under the AQF is prescriptive, however it is not so prescriptive as to prevent the fast tracking of courses or allow credit for students with appropriate/recognised prior learning. The current AQF recognises that universities are the discipline experts and, appropriately, allows universities to construct courses based on that expertise. It is critical that this flexibility remains.

Key aspects of the AQF that require attention and/or areas where there could be reform include the following [further feedback on these and other issues is provided under Questions 2 and 3].

Shorter form credentials: ACU broadly agrees that there is a need to widen the range of credentials that are included in the AQF - particularly, to include shorter form credentials in the AQF (as the Discussion Paper recognises). This would better align the AQF with overseas qualifications frameworks, support the international competitiveness of Australia's tertiary education system, and would likely strengthen the nation's formal skilled workforce.

However, any introduction of shorter form qualifications to the AQF must be accompanied with appropriate minimum requirements and quality assurance measures.

Recognition of Prior Learning (RPL): The national system of credit for the recognition of prior learning and articulation generally is institution dependent and not uniform. This produces differing levels of consistency with the AQF in terms of knowledge, skills and volume of learning. It should be ensured that the rationale, function and evaluation of RPL is clearly and better articulated. Furthermore, support could perhaps be given to facilitate a shared credit transfer register for consistency and transparency across providers and jurisdictions.

AQF taxonomy, levels and descriptors: The AQF descriptors need to be revised to remove duplication between descriptors. The descriptors could also be simplified and more clearly articulated to ensure clearer distinctions between AQF levels. Furthermore, it should be ensured that the AQF taxonomy appropriately recognises the distinct characteristics and identity of Higher Education and Vocational Education and Training (VET) (and other competency-based training) courses/qualifications, respectively.

ACU recommends that the AQF be periodically reviewed into the future, to ensure that it is responsive to changes in work practices, technological developments, and changes in qualifications requirements and the nature of teaching and learning.

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.

The Discussion Paper canvasses introducing shorter form credentials to the AQF, to widen the range of credentials that are recognised in the framework. As identified above, ACU broadly supports the inclusion of shorter form credentials in the AQF.

The inclusion of shorter form credentials, such as micro-credentials, would support a sector-wide approach and provide guidance to providers in this area - rather than allowing for multiple interpretations. With respect to an appropriate model, consideration could perhaps be given to basing this on the Scottish model, which is a comprehensive system that may be fit for Australian purposes. For example, the Discussion Paper notes that the AQF could similarly include shorter form credentials that facilitate “preparation for work, preparation for further study, and skills and knowledge extension building on a previous award...”¹ However the Review Panel should ensure that any introduction of shorter form credentials to the AQF recognises that:

- Higher Education is intrinsically different to VET or competency-based learning, and as such, every shorter-form credential may not relate or translate to a Higher Education qualification and should not be made to do so artificially.
- Such reform, if progressed, should be accompanied by appropriate quality-assurance requirements.
- Regulation of shorter-form courses would need to be consistent so as to provide certainty for providers, consumers and industry. The system must be robust and systematic.

All AQF credentials, even micro-credentials, need to have some sort of quality assurance and assessment/measurement of learning attached. Most importantly, this should be at a uniform national level. The minimum requirements set out in the Discussion Paper with respect to shorter form credentials are broadly appropriate. Furthermore, the Review Panel could perhaps consider recommending some sort of credit point equivalency based on volume of learning; for instance, a minimum of 1cp equivalent would perhaps be suitable,

¹ Discussion Paper, at 17.

as otherwise administration becomes too difficult and complex. This would equate to around 3-4 hours face-to-face or equivalent based on the formula of 1-2 hours preparation and post contact assessment per contact hour.

Further issues and recommendations for reform are discussed under Question 3 below.

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.

ACU makes the following broad comments with respect to the Review:

- The Review and any changes introduced to the AQF should not be too prescriptive on providers. Universities need the flexibility to apply innovative design and delivery to courses. This supports maintaining quality learning outcomes while also being responsive to student needs. For example, it is important that the requirements with respect to volume of learning and course content are not too prescriptive, as this could hinder the development of innovative online and/or blended approaches to learning.
- The Review Panel should recognise and reiterate the distinctions between, and specific characteristics of, competency-based qualifications and Higher Education qualifications. A Higher Education qualification is more than the sum of its parts. This is a fundamental point when conceptualising non-Higher Education qualifications as being part of a 'stacked continuum', as artificial equivalencies can tend to be drawn between Higher Education and non-Higher Education qualifications (or part qualifications).

VET qualifications lend themselves to the idea of 'stacking' based on the development of demonstrated skills, and pathways to higher levels of competency in a particular field. Whilst this is true of some competency-based Higher Education qualifications, for example practice-based health disciplines, evidence-based (or research-informed) learning is an intrinsic attribute of Higher Education and does not neatly fit the same model as competency-based education and qualifications. For example, it is not possible to draw a meaningful equivalence between a Doctoral Degree and a Professional Apprenticeship. Furthermore, the proposal to identify individual 'skill sets' or 'supplementary courses' in a particular subject as being equivalent to an AQF level would generally not work well for Higher Education qualifications. If a 'stacked' or cumulative approach to reflecting qualifications is desired as canvassed for discussion in the Discussion Paper, then the Irish or New Zealand qualification frameworks are perhaps worth considering further.

- Work to redefine and/or reaffirm skills levels for different qualifications, to refine AQF provisions and provide greater clarity for users, would also be beneficial (for example, it is generally understood that a Graduate Certificate is of lower level complexity than an honours degree).

ACU provides the following feedback with respect to specific questions and issues raised in the Discussion Paper:

Shorter form credentials

As identified above ACU supports, in principle, the inclusion of shorter form credentials in the AQF. There is value in facilitating formalisation of a micro-credentialing process through the AQF. However, there would need to be AQF level equivalence with accreditation (particularly those required by graduates for professional registration, which are arguably at

levels 8-9; while enabling TAFE courses may be at lower AQF levels). A significant benefit of formalising micro-credentials in the AQF would be with respect to professional associations and regulatory bodies, as it would enable the granting of formal credit/recognition for ongoing professional development that could then link individuals on to postgraduate (or even undergraduate) study at institutions; supporting lifelong learning.

With respect to specific issues raised in the Discussion Paper and/or with respect to implementation, ACU provides the following feedback:

- The Review Panel could suitably draw upon existing criteria in the AQF with respect to adding a new, shorter form qualification type to the AQF – specifically, the level of learning, outcome and volume of learning should be utilised.
- Shorter form credentials could be aligned to the AQF by assigning them across a number of applicable AQF levels, while also recognising that not all shorter form credential types will have an equivalence. This is particularly true at the higher level Higher Education qualifications, and especially in relation to research degrees.
- The Discussion Paper proposes creating a shorter form credential type that is defined by its link to a qualification type to “help to aggregate shorter form credentials into qualifications.” It is not clear how all shorter form credentials could be described in this way and how this would work. It may be possible to do this for competency-based education qualifications, but not for the research-informed learning in Higher Education qualifications.

Enterprise and social skills

The Discussion Paper suggests that the treatment of ‘enterprise and social skills’ (i.e. professional and technical skills, and interpersonal and creative skills) could be clarified in the AQF. It would be sufficient to expand the list of enterprise and social skills included in the AQF, with guidance and advice included (it is not clear why these skills would need to be tagged at particular AQF levels). However, consideration should perhaps be given to recognising stand-alone programs such as ongoing professional development for existing graduates.

An AQF reference credit point system

The Discussion Paper suggests: changing the ‘volume of learning’ unit of measurement from years to hours²; and basing the number of hours for a qualification type on the needs of a new learner, in order to provide a common baseline for volume of learning. ACU considers that while this may work well for VET qualifications or other competency-based learning, it would not be appropriate for Higher Education qualifications - especially in research degrees. To illustrate, it is problematic in that, for example, 100 hours of competency-based learning is very different to 100 hours of research-informed learning. Maintaining international equivalency of Higher Education qualifications under the AQF and the transferability of qualifications should also be ensured.

ACU considers that additional information is needed to determine whether an AQF reference credit point system would be appropriate and could be suitably designed³, to replace ‘volume of learning’. Detailed exploration of overseas practice would be beneficial in this respect. Particular issues that would need to be tackled include how hours of learning would be evaluated under such a scheme, and across different learning contexts. Evidently, as reflected above, 10 hours of learning in one form is not necessarily equal to another, thus consideration would need to be given to determine whether (and to what extent), for example, tutorials, lectures, online learning, and practical placements etc. are equivalent and/or how credit points would allocated under such a system.

² As the Discussion Paper notes, each qualification type in the AQF has a ‘volume of learning’, which states the typical duration – in full-time years – of all activities (e.g. classroom and self-managed learning) needed to achieve the learning outcomes for a particular qualification. See the Discussion Paper, at 27.

³ The Discussion Paper outlines two possible approaches to introduction such a system: 1) an optional system set out only in the AQF and to which providers could match their existing systems; or 2) a national system that is given effect through the AQF and sector standards, and phased in over time (Discussion Paper, at 29).

Furthermore, if a common credit point/hours of learning system is introduced, there may be no impetus for change if the system is only used on a voluntary basis (as suggested as an option in the Discussion Paper). In this event, the existing systems would likely remain in place with some variance across the sector, which would be undesirable.

Senior secondary certificates of education (SSCE)

The Discussion Paper contemplates how the AQF could better reflect the role of the SSCE as a pathway to further education, training and employment. In this respect, ACU suggests narrowing the approach recommended in the Discussion Paper, namely to: 'revise the SSCE descriptor to recognise that *some of* [rather than having this provision open ended] the knowledge and skills acquired in the SSCE can be at a broad range of AQF levels and result in multiple pathways.'⁴

AQF taxonomy, levels and descriptors

ACU agrees that there is a need to remove the duplication that exists in the current AQF descriptors, as reflected in the Discussion Paper.⁵ The repetition and/or contradiction that is apparent in some descriptors can be confusing for AQF users.

There is also a need to revise the AQF descriptors, that is, within and between the different AQF levels. ACU supports the proposal to simplify these descriptors to ensure clearer distinctions between levels, and to revise wording where descriptions are too general or non-specific; for example, to redress issues where skill descriptors are applied inconsistently across levels or qualifications and address ambiguity such as in the example provided in the Discussion Paper.⁶

The Discussion Paper proposes revising the AQF taxonomy with respect to the 'application of knowledge and skills'.⁷ It is asserted that this is necessary, in part, to better recognise the relatively 'higher levels of autonomy and responsibility' in the workplace of people with trades certificates or lower-level AQF qualifications, compared to those with degree and postgraduate qualifications. ACU considers that it is not appropriate to revise the AQF taxonomy in this manner based on this rationale. A tertiary education qualification, and higher education qualifications especially, are not about the level of 'autonomy or responsibility' exercised by the individual in the workplace. This reasoning should not be a driver of change.

There is, however, an opportunity to revise the AQF taxonomy in light of changing skills requirements, new qualifications and changing technologies. It is also important in this context for the Review Panel to recognise, as identified above, that VET and other competency-based education is different to Higher Education. Broadly, they serve different purposes; and while competency-based courses/qualifications may form pathways to, or comprise components of, a higher education qualification, they are – and should remain – distinct and separate. To reform this area, consideration could perhaps be given to formulating a form of loose parallel ladders comprising higher education qualifications on one hand, and competency-based qualifications (particularly VET) on the other, also encompassing qualifications or courses where there are points of crossover and/or permeability. This could help to remove the perception of a hierarchy from VET to Higher Education.⁸

⁴ Discussion Paper, at 26.

⁵ As per the Discussion Paper, at Section 4.3.

⁶ See the Discussion Paper, at 25.

⁷ As the Discussion Paper identifies, taxonomies in this context describe learning outcomes at different levels of complexity; and the current AQF describes learning outcomes in three domains, namely: knowledge, skills, and application of knowledge and skills. See the Discussion Paper, at 22.

⁸ As noted in the Discussion Paper, preliminary consultations evidently confirmed that "many people think of the AQF as a ladder with VET qualifications at the bottom of the ladder and higher education qualifications at the top, creating an implied hierarchy that values higher education over VET." (Discussion Paper, at 23).

AQF policies and explanations

Qualifications Pathways Policy

The Discussion Paper suggests revising the AQF Qualifications Pathways Policy to provide guidance to providers with respect to RPL - while noting that the primary responsibility for determining and providing appropriate pathways sits with providers, training package developers and regulators - and to develop a shared credit transfer register.

ACU agrees that it is important to have consistent national policy in this area. It is noteworthy that work is already underway in the sector to develop a national approach to credit recognition, through the Tertiary Admission Centres, and this should be taken into consideration.

Qualifications Issuance Policy, and Qualification Type Addition and Removal Policy

ACU considers that the AQF Qualifications Issuance Policy, which sets out requirements for issuing graduates a testamur and record of results, should be retained. There is clear value in setting out a single consistent approach (enacted through the Higher Education Standards Framework and the RTO standards), as this will ensure uniformity across providers and serve to prevent a drift in standards. The policy should also be expanded, as necessary, to cater for any new types of shorter form credentials that are included in the AQF in the future. Furthermore, with respect to the AQF Qualification Type Addition and Removal Policy, which articulates criteria for determining whether a qualification type should be included in the AQF, ACU agrees that this policy should be retained.

Alignment of the AQF with international qualifications frameworks

The Discussion Paper suggests removing, from the AQF, the “Principles and Processes for the Alignment of the AQF with International Qualifications Frameworks” and instead, to retain this as a Department of Education and Training policy.

As identified above, ACU considers that a key strength of the AQF is that it provides guidance on the substantive elements of a domestically and internationally recognised set of qualifications. Thus, it is imperative that international equivalence with respect to volume of learning in Higher Education qualifications is maintained. Provided there is either a policy or a published guidance on this matter, it is not particularly important where the document is housed. However, it would assist providers and other relevant parties if this information and guidance were retained in one place; therefore on balance, ACU does not consider there is a compelling case for change in this area.

AQF explanations

With respect to where to appropriately house AQF explanatory information⁹, it would be sensible to retain this information in one place. This is preferable to having them scattered across multiple sets of guidelines and managed by different regulators - for example, the Discussion Paper suggests the possibility of incorporating this information in relevant guidelines published by ASQA, TEQSA or other regulators, which is not ideal. Therefore, ACU considers that there is no compelling case for change in this regard.

⁹ That is, written explanations pertaining to matters such as credit, clustered qualifications, disciplines, graduates etc., which are currently part of the AQF.