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Professor Peter Noonan
Chair
Australian Qualifications Framework Review Panel
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Dear Professor Noonan

Thank you for the opportunity to provide the Tasmanian perspective on the Australian Qualifications Framework (AQF) through this review. The AQF remains an integral part of Australia's framework for quality assurance in education and training and the work being undertaken through the Review will ensure its importance continues.

I understand the consultation sessions in Tasmania on 15 February 2019 with Tasmanian Government officials and industry, community stakeholders and the Review Panel were helpful in constructing the Tasmanian Submission.

I look forward to considering the outcomes produced by the Review.

Once again, thank you for the opportunity to participate in the Review and please find the Tasmanian Government Submission marked as Attachment 1.

Yours sincerely


Jeremy Rockliff MP
Deputy Premier
Minister for Education and Training

Encl

Tasmanian Government Submission

Review of the Australian
Qualifications Framework

IS THE AQF FIT FOR PURPOSE?

The AQF's strength is that it provides a national framework for regulated education and training in Australia that integrates all education sectors.

The objectives of the AQF remain relevant, however the framework's ability to meet the objective of influencing the use of pathways and promoting a more coherent tertiary system may be problematic, given the many stakeholders and factors involved.

It is important to keep in mind that the intent of the AQF is related to regulated qualifications and the framework is fundamentally sound for this purpose, notwithstanding some issues regarding the taxonomic structure, which can lead to difficulties in interpretation and implementation.

The main users of the AQF at present are accrediting authorities and developers of qualifications for accreditation. The AQF provides the framework for accrediting authorities in all education sectors and developers of qualifications. It aims to ensure a level of consistency in relation to the 10 AQF levels that define the relative complexity and depth of achievement and the autonomy required of graduates.

AQF qualifications are valued by industry, employers and individuals. The AQF is also useful in explaining education and training options available in Australia for local and international students.

Secondary users of the AQF framework include industry and employers, licensing authorities, students, teachers etc. These groups are interested in the AQF for purposes such as assigning an appropriate qualification level for occupations, pathway planning, occupational licensing and industrial award structure. Their primary need is to understand the difference between levels and have confidence in the levels attributed to a particular qualification.

The AQF needs to be as simple as possible for users to understand and utilise. The framework should be used as a high-level guide and have clear objectives and boundaries. Any framework will have limitations as it is not feasible to design a qualification framework that meets all stakeholder needs.

There are some concerns that the AQF is designed to classify full qualifications only and does not cover shorter form credentials such as micro credentials and skill sets, for which there is increasing demand. This is discussed in the section below on a wider range of qualifications.

AREAS FOR POSSIBLE CHANGE

1. Taxonomic structure

The AQF is defined by a taxonomic structure of levels and qualification types defined by learning outcomes which include knowledge, skills and the application of knowledge and skills. The differentiation between levels and qualification types is not always clear which creates difficulties in interpretation and implementation of the framework. In some cases, there are contradictory statements between level and qualification type descriptors.

A revision of levels and taxonomies would benefit from greater clarity of what equivalency means; such as (student) autonomy, application of knowledge or responsibility once qualified or the complexity and nuance of understanding needed to qualify.

Tasmania supports in-principle the proposal in the discussion paper to remove level descriptors from qualification type descriptors to eliminate current repetition and contradiction between level and qualification type descriptors. A review of the application of knowledge and skills domain in relation to AQF levels would also assist. Greater clarity of descriptors would especially assist developers of training products to allocate products to the correct level eliminating some of the following examples of inconsistencies in AQF application.

- Different interpretations of the descriptors across industry sectors and therefore alignment of occupations with levels. A Certificate III qualification in one industry might have quite different competencies, skills and complexity compared with the same level qualification in another industry. For example Certificate III in Civil Construction may take four years to complete and has 1375 nominal hours; a Certificate III in Retail has 395 nominal hours, indicating that the skills, knowledge and application of these two qualifications are substantially different.
- The level and autonomy for Certificate III trade qualifications appear to be understated in the AQF and the level of autonomy of higher-level qualifications may be overstated, perhaps due to adherence to outdated hierarchical occupational hierarchies.

The perceived hierarchical nature of the AQF may lead to the perception that higher education is more valuable than VET. While it is not possible to avoid hierarchy totally, alternative ways of depicting the framework could be explored, perhaps with more examples of pathways from VET to higher education and vice versa.

Changes to the AQF structure may have implications for industrial awards or occupational licensing criteria, however the AQF should not be designed around this. Any significant change to the AQF may have legislative and/or industrial relations consequences that need to be considered in implementation.

2. Wider range of qualifications

Currently the AQF relates to complete qualifications only. While some short-form credentials, such as skill sets and accredited courses, are related to AQF qualifications, they are not included within the structure of the AQF. Other credentials such as micro credentials are outside the regulated training sector.

With the fast pace of change in the nature of work there is increasing demand for flexibility and responsiveness in the system. The development of shorter-form credentials (such as micro-credentials, skill sets, and short courses), which can be developed in a shorter timeframe than training package qualifications, are seen as an opportunity to improve VET responsiveness to industry. There is also evidence of demand for quality short courses to provide constant upskilling for mature aged workers.

In the school sector, micro-credentials provide improved customised learning choices for students, particularly in Years 9 to 12. Tasmania is currently exploring the potential for modularised courses in Years 11 and 12 which can be assessed as a set of micro credentials. This would add to the broad range of formal learning options recognised as making a direct contribution to the Tasmanian SSCE (Tasmanian Certificate of Education (TCE)).

The feasibility and cost-benefit of including shorter-form credentials in the AQF needs to be balanced against the extent of demand by end users and the regulatory and administrative cost of an effective level of quality assurance. It is suggested that further work is required to closely examine these aspects, including exploring how shorter-form credentials can be aggregated and linked to a qualification at the relevant AQF level, before any decision is made to include these in the AQF.

The inclusion of skill sets may be less problematic than the inclusion of micro-credentials. Students completing units achieve a Statement of Attainment in which the level is reflected in unit codes. There are also nationally recognised skill sets. Guidelines could be established to determine the AQF level of a skills set. For example, if most units in a skill set are at Level III then the Skills set could be assigned at Level III. The volume of learning also needs to be taken into consideration. Shorter form credential types could be aligned to AQF levels by assigning them across a number of applicable AQF levels

The review paper *Incorporating shorter form credentials into the AQF* notes the criteria that any qualification type listed into the AQF must comply with. If work to include shorter form credentials in the AQF proceeds the suggestion that these criteria could be adopted, is supported.

A further issue in relation to micro-credentials and similar training is that even if the training is mapped to the AQF, the provider/developer may be unregulated and unaccredited, so inclusion of this training may, by association, undermine the integrity of the AQF.

The Productivity Commission's support for a framework for certifying and quality assuring micro-credentials is stated in the discussion paper (page 15). The feasibility of the AQF incorporating this needs to be carefully examined. The New Zealand approach which includes recognition of micro-credentials without inclusion in the qualifications framework may have some merit but would still require regulators to monitor this in some way.

3. The treatment of enterprise and social skills

Enterprise and social skill requirements are context specific and will vary significantly across sectors, industries and occupations, and this may make it difficult to represent within the AQF taxonomy. They are transferable skills that can be used in a range of work and learning contexts and sit at a level beyond technical and foundational skills.

Tasmania notes there are examples of classifying and assessing enterprise and social skills. In schools, the Australian Curriculum emphasises General Capabilities and this can flow through to senior secondary course design. The Core Skills for Work Developmental Framework provides a range of key work skills and describes stages of performance from novice to expert. The University of Sydney is piloting the development of scales to measure graduate qualities such as cultural competence, critical thinking and influence. Tasmania will consider the role of general capabilities/core skills for work in the re-design of Years 9 to 12 courses.

An option exists for minimum requirements in skills where there is an objective ability to benchmark capability, to be embedded into the requirements of a qualification at a level that is broadly relevant across sectors. Within the context of the SSCE, there may be greater value in focusing on the national agreed general capabilities as defined by the Australian Curriculum Assessment and Reporting Authority (ACARA).

In the context of VET, social and enterprise skills should be specified, taught and assessed within the qualification's core content. Trainers need to be specifically trained and assessed themselves to ensure competency and currency to deliver. Social and enterprise skills should be a requirement of the Cert IV Training and Assessment (or equivalent) qualification.

Tasmania recognises that the school, VET and higher education sectors hold differing views on the inclusion of enterprise and social skills in the AQF. Tasmania supports undertaking further work across sectors to reach consensus.

This issue is also being addressed in the Training Product Reform (TPR) work as well as the expert review of VET. It is noted that this review has indicated a desire to pursue this issue in parallel with the TPR working group.

4. Volume of learning

The Volume of Learning intent in the VET sector is normally expressed in nominal hours, primarily to provide guidance to users and clients of the system, in particular, for teaching, funding and reporting. It is not intended to be prescriptive.

The report notes that too much emphasis on volume of learning reduces flexibility in terms of delivery and doesn't necessarily produce better outcomes. Ultimately, a competent learner is the desired outcome of training. Many learners have relevant qualifications and experience that justify their completion of a qualification in a shorter time frame than suggested by the volume of learning.

ASQA has raised concerns about courses in the VET sector being delivered in what seems to be unreasonably short timeframes. This is not an issue for the AQF per se, rather it is training package design issue together with an audit and performance management issue in terms of the outcomes of such training. If graduates are exiting these courses as competent and able to perform to industry standard the duration is not a concern. It becomes a concern when the shorter course delivers insufficient training for the student to be validly assessed as competent.

It is suggested that volume of learning should continue to be provided in the AQF as a guide only and that further reference to specific volume of learning in the VET sector is more appropriately included in training packages or curriculum documents. It is recommended that the volume of learning be based on the number of hours for a qualification type for a new learner.

The proposed approach to establish an AQF reference credit point system is supported in that it provides a voluntary reference for providers and simplifies the process of counting VET units towards TCE qualifications. Currently, in Tasmanian schools, VET units that have nationally agreed nominal hours are allocated a credit point value for recognition in the TCE.

Caution should be applied when comparing credit point values across courses at a particular AQF level as it may not be reflective of complexity.

5. Senior secondary school certificates

Tasmania supports the re-inclusion of the SSCE descriptor in the AQF. This will be of great benefit to senior secondary course developers at state/territory level and provide greater clarity for the development and assessment of expected learning outcomes. The concept of micro credentials, or recognition given to smaller 'chunks' of learning, also supports the re-inclusion of the SSCE in the AQF, where individual subjects or courses can be assigned an AQF level, supporting national consistency in curriculum design.

However, it is acknowledged that aligning school certificates may require a considerable amount of work and may not be easily aligned to one AQF level. The Discussion Paper accurately observes that an Australian secondary school graduate could have gained knowledge and skills from several

different AQF levels (for example VET certificate subjects or foundational university subjects through High Achiever Programs); however, it is noted that this is true of many qualifications described in the AQF.

It is recognised that stakeholders have previously hesitated to agree on the AQF level that most appropriately corresponds to the level of complexity achieved in a SSCE. With members in each Australian jurisdiction, the Australasian Curriculum, Assessment and Certification Authorities would be well positioned to explore this matter further.

6. AQF policies

The **pathways policy** reinforces the concept of the importance of pathways and credit. It could be revised as guidance noting that the primary responsibility for providing pathways sits with providers, developers and regulators.

A **credit transfer register** is likely to be expensive to maintain and of little use. Providers should be encouraged to provide information to students on credit transfer arrangements and how to access this.

The **qualifications issuance policy** has value in reinforcing a single approach to issuing AQF qualifications. RTO and HESF issuance requirements should mirror the AQF policy requirements.

The **AQF Register policy** is not required. This register was never established and would duplicate information available on training.gov.au, the TEQSA national register and state and territory registers of SSCE qualifications.

The **AQF Qualification type addition and removal policy** should be retained. It outlines criteria for deciding if a qualification should be included in the AQF.

The AQF should **retain responsibility for principles and processes for the alignment with international qualifications frameworks** to ensure that the integrity of the AQF is maintained. Moving this responsibility to a departmental policy carries a substantial risk that, over time, determinations could be made on the basis of economic criteria which could adversely affect the integrity and perceived value of AQF qualifications in Australia and internationally.

7. AQF Explanations

There is value in maintaining the explanations in the AQF to facilitate understanding of the framework.



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