



Respondent name

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Respondent organisation

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Monash University welcomes the opportunity to provide input to the review of the Australian Qualifications Framework (AQF). Given the disruption to models and methods for education delivery that all providers have experienced in recent years, it would seem both pertinent and timely to reconsider the objectives and structure of the AQF to ensure it continues to best serve the Australian education sector.

Monash notes that the value of AQF is not limited to education institutions and the students they teach; industry and professional bodies have embedded its principles into practice, and other overseas education systems have utilised the AQF as a benchmark for the development of their own systems of qualification recognition. As such, it is critical that the AQF evolves where necessary to maintain its currency and relevance as a national policy document. However, Monash notes and stresses the need for a wide-ranging view of potential impacts arising from any changes made to the AQF on the broader regulatory landscape.

Responses to the specific questions posed in the discussion paper are presented below.

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

The AQF is, in many ways, fit for purpose. As a policy instrument, the AQF supports international recognition of Australian education, and provides a sound and rational basis for comparable systems. The AQF guides consistent articulation of qualifications across the national system and translates pathway options for students that are increasingly complex and varied.

Monash believes there would be value in improving existing distinctions at AQF Level 9, which could be further differentiated to recognise the skills and outcomes gained through each of the Masters by Research, Masters by Coursework and Professional Masters, as well as improving guidance provided regarding articulation from a level 9 to level 10 qualification.

Monash is not supportive of any changes that would require mapping of existing offerings to the unit level. Existing obligations within both the *Higher Education Standards Framework (Threshold Standards) 2015* and AQF to publish credit transfer policies and precedents are sufficient.

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.

Monash is broadly supportive of recognising some types of microcredentials in the AQF; to introduce a separate system specifically for microcredentials would represent a missed opportunity to integrate these types of credentials into a well-recognised, existing framework. The popularity of short-form study and microcredentials continues to increase, and students would benefit from enhanced international comparability and portability of these credentials if they were mapped to the AQF.

However, there are a number of difficult issues for the Panel to consider and Monash offers the following comments to assist in informing these discussions.

- The AQF should not be extended to short courses for social or professional skills, or to microcredentials that recognise skills developed through co-curricular or experiential programs, such as the use of 'digital badges'. The costs associated with attempting to clearly define and regulate these skills is prohibitive when balanced against the perceived value, and this case hasn't been made by the Review panel in its discussion papers.
- Recognition of microcredentials through the AQF must not impact on a provider's right and responsibility to maintain the integrity of their awards. Similarly, those providers should be responsible for determining the credit given, or not given, for any short course or combination of short courses.
- Microcredentials are not akin to incomplete qualifications. The latter are currently regulated and quality assured, and routinely recognised by institutions in the awarding of 'Recognition of Prior Learning'. Monash suggests that the AQF limit inclusion of microcredentials to those that are quality assured.
- Not all forms of short-form learning would be suitable for credit, or 'stackable' credentials. If microcredentials are to be enabled by the AQF, Monash asserts that unassessed, reflective, short courses are not appropriate as credit-bearing or 'stackable' credentials.
- Monash is not supportive of extending the AQF to individual unit level.
- A clear set of terms and definitions relating to microcredentials is needed to avoid the proliferation of similar terms (such as 'nanocredentials'), which have the ability to confuse, and ultimately undermine, a national approach to the recognition of short-form learning. Monash suggests that an alternate term be introduced to indicate a microcredential that is mapped to the AQF.

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.

Monash is opposed to any alterations that would remove the AQF level 8 by collapsing it into level 7 or 9. Such a move would have far-reaching consequences for the ability of universities to meet

Standard 3.2.3c of the *Threshold Standards* that requires staff involved in teaching to hold a qualification one AQF level higher than the level being taught. In practice, universities meet this requirement through the use of students enrolled in doctoral studies, who often hold an Honours degree (AQF 8), to teach into Bachelor degrees (AQF 7). If recognition of the Honours year as a separate AQF level was removed, then only students already qualified with a Master level would be able to take on these roles, resulting in a shortage of qualified teaching staff for Bachelor (AQF 7) level degrees.

Monash would welcome efforts to further clarify volume of learning, noting modes of delivery and changing teaching patterns create challenges in continuing to measure volume of learning in years. Nevertheless, Monash recognises that there is merit in requiring a time-based element to level classifications, particular from a regulatory standpoint as it provides a counter-balance to opportunistic providers who might see a market in offering rapid completion qualifications of lesser rigour. The justification of 'new learners' as a yardstick for volume of learning, as articulated in the discussion paper, is supported.

While recognising that a credit point system may appear to be a good solution, the costs involved in implementing a National Credit Point system are likely to be prohibitive. Furthermore, it is not clear how replacing volume of learning with a credit point system would apply in a graduate research context where the nature of those courses is less mechanistic.

The regulatory impact of any large-scale changes to the AQF, and the concurrent review of the Provider Category Standards, needs to be carefully considered and planned for. TEQSA does not currently regulate non-award courses, including short-courses. If microcredentials are to be recognised in the AQF, what impact would such a move have on TEQSA's workload, and by extension the impact on the Agency's regulatory activity?

4. Other

Many of the points included in this submission are in-line with the submission from the Group of Eight. However, a point of distinction is Monash's strong in-principle support for the inclusion of microcredentials in a revised AQF. This support is, however, contingent upon the issues presented under Question 2 being satisfactorily addressed.

Monash also wishes request that the Review panel takes care to not conflate the terms 'foundational' with 'Foundation', as the latter is a highly regulated term with specific meaning under the *Educational Services for Overseas Student Act (2000)*.