



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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Respondent organisation (where relevant)

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

The relevance of the AQF with embedded qualifications is unclear and open to different interpretations.

For example, if a provider has no embedded qualifications in an AQF7 Bachelor, all 3 years are AQF7.

However, another provider has embedded qualifications, such as an AQF5 Diploma or AQF6 Associate Degree then those qualifications are mapped to a lower AQF level.

I have had discussions with providers who have mapped 1st year to AQF5, 2nd year to AQF 6 and 3rd year to AQF7 – even though they have no embedded qualifications - so what is the basis of mapping to a non-existent qualification? Scaffolding is the answer but you can scaffold without mapping to a non-existent AQF qualification.

While this also applies to AQF9 with an embedded AQF8 qualifications, for both AQF7 and 9 it is creating a situation where not all AQF7 Bachelor and AQF9 Master qualifications are in fact equal.

Volume of learning is also an issue where universities with SAA can have 9 or 10 week teaching periods and the regulator does not allow non-university providers to benchmark against what universities do – so again the qualification is not equal. The regulator may respond by saying that this comes under the SAA but there is a different treatment depending on the category and SAA status of the provider.

The issue of levels of credit also creates issues with the AQF Pathway Policy 2.1.9 providing guidance on levels of credit for prior study is inappropriate as broad comments such as up to 50% make agents and students expect the maximum which is at odds with HESF1.2.1a. Certainly in areas with professional accreditation this may lead to issues regarding the professional recognition of a qualification for admission purposes and while the provider may within the limits of the AQF give generous levels of credit, it may come back to be disadvantaging students who then discover they have issues with professional recognition and what role the provider played in the creation of this situation – the defence being they relied on the AQF.

If there AQF is to stop being a joke and a waste of time it needs to have equal treatment for all providers irrespective of the SAA status, name, ownership – all for one or none for all.

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 AQF needs to have legislative force as do the HESF and National Code. The AQF needs to offer guidance and not leave application of the Framework open to subjective interpretation. A prescriptive approach is not desirable, but there needs to be either written guidance or additional content on the correct interpretation, to guide not only providers but regulators, on how to ensure that there is scaffolding of learning, that pathways for future learning do not imply moving from 5 to 6 to 7 to 8 to 9 to finally 10, but could be sideways or even moving to a lower number (I have experienced situations where a regulator has taken providers to task as they could not demonstrate pathways to future learning moving from a 9 to a 10 in the AQF, other AQF9 or lower number levels was not seen as acceptable).

While there is no appropriate body to be creating guidance notes, the Framework document could include examples to clarify what is acceptable in interpreting and applying the Framework, especially for regulators who have staff with no educational background or experience and are making calls on if an interpretation is acceptable to them.

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.

This is embedded in the responses to 1 and 2 above.

Other