



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.

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)

Australian Skills Quality Authority

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

The Australian Qualifications Framework (AQF) is the national policy for qualifications in the Australian education and training system. An important purpose of the AQF is to describe the diverse range of qualifications offered in the three education sectors: schools, VET, and higher education. It incorporates the qualifications from each education and training sector into a single comprehensive national qualifications framework.

The AQF can provide a pathway for a person to achieve qualifications that support them in finding employment, upskilling, gaining vocational experience or changing vocational pathways. ASQA is of the view however there are gaps due to the current architecture of qualifications and how they align to rapid technology and environmental changes across industry sectors including the traditional trades.

In relation to VET qualifications, the primary audience for the AQF are organisations:

- that develop qualifications (that is, training package developers and VET accredited course developers)

- authorised through government legislation in Australia to accredit AQF qualifications (that is, bodies that approve training packages and accredit VET courses), and
- authorised through government legislation in Australia to issue AQF qualifications (that is Registered Training Organisations (RTOs)).

ASQA, through its regulation of RTOs, notes that the application of the AQF through these arrangements can be somewhat confusing for RTOs to understand and comply with. This is particularly noticeable in terms of the Volume of Learning (VoL) required for qualification types. ASQA understands that the AQF is necessarily broad in order to serve all industry and education sectors and to recognise that learners can achieve competence in different timeframes. The application of the AQF in the VET sector is through industry-specific training packages and the *Standards for RTOs 2015*. It is ASQA's view that the complexity of these regulatory arrangements are not clearly communicating the intent of the AQF volume of learning requirements.

Furthermore, the inclusion of both RTO-supervised and individual-directed learning activities within the VoL, without guidance about how much volume should be allocated to each type of activity is problematic. ASQA is of the view that currently the AQF does not provide sufficient guidance to RTOs, learners, or regulators about the expected duration of courses overall or within courses between types of learning activities.

This lack of specificity of the VoL measure impedes ASQA's ability to respond effectively to instances of unduly short course duration, as there can be differing judgements between ASQA and the RTO about what the appropriate VoL is for a particular cohort of learners.

The flexibility inherent in the lack of AQF prescription about which hours of learning require direct learner supervision and which can be learner self-directed activity means that RTOs can argue that their courses meet AQF VoL requirements when the majority of a course is essentially self-directed learning with limited interaction with trainers and assessors. This can serve to undermine the integrity of the AQF and the reputation of VET more broadly.

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.

Volume of Learning

ASQA is of the view that the Review of the AQF provides the opportunity to clarify the Volume of Learning (VoL) indicators.

The flexibility inherent in the AQF is compounded by the lack of clarity in training packages and the *Standards for RTOs 2015* and results in there being little specific guidance to RTOs or the regulator about the amount of training that should be undertaken as 'supervised' activities. This can result in differing professional judgements between RTOs and the regulator about the required amount of training that needs to be delivered in a supervised environment. At worst, this can open the door for RTOs to assert that the apparent short duration of their courses is due to the way they have allocated volume of learning across RTO supervised and learner directed activities. That is, they can assert that while the supervised activities may be of short duration, the bulk of the course is 'self-directed' and therefore the totality of the course duration is in line with the AQF requirements.

On 30 June 2017, ASQA released a report on its strategic review of course duration, *A review of issues relating to unduly short training*. The report made three recommendations – including that the term ‘amount of learning’ be defined in the *Standards for RTOs 2015* to include supervised learning and assessment activities.

The inclusion of a definition of amount of training in the *Standards for RTOs 2015* that specifies the supervised learning and assessment activities that are included would strengthen and clarify the current legislative framework. The amount of training, so defined, would form a component of volume of learning and enable greater guidance to be given to RTOs about the amount of supervised learning and assessment activities that should be delivered.

The AQF review discussion paper includes a number of possible approaches to VoL which are congruent with recommendations from ASQA’s strategic review of course duration (and partially respond to the above recommendation), including:

- to continue to provide guidance on the breadth and depth of a qualification, change the volume of learning unit of measurement from years to hours
- to provide a common baseline for volume of learning, base the number of hours for a qualification type on the needs of a new learner
- 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; and
- to provide a common baseline for credit points, and base the number of points for a qualification type on the needs of a new learner.

However, ASQA is of the view that these proposals will not address the separate but related issue that the *Standards for RTOs 2015* do not reference the volume of learning indicators but rather use the term ‘amount of training’, which is not defined. It is ASQA’s view that the term ‘amount of training’ should be defined to include supervised learning and assessment activities and form a component of the volume of learning requirements. This would provide greater certainty for providers, regulators and learners.

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.

In addition to ASQA’s feedback on Volume of Learning above, ASQA has provided limited commentary on other approaches proposed in the discussion paper.

Shorter form credentials / micro-credentials

ASQA understands that industry is increasingly looking for short form training offerings to re-skill or upskill the labour market, particularly in areas of rapid technological change. Employers are looking for more targeted training for specific skills needs, to complement and supplement full qualifications, rather than replace them.

In the VET context, the accreditation of VET courses for the purposes of meeting emerging or niche industry skills needs, use of skill sets and partial completion of qualifications (leading to statements of attainment) have been established to address the needs of industry. The Panel may wish to consider better recognising these existing shorter form credentials within the AQF structure.

The discussion paper suggests a number of options to allow for greater recognition and flexibility of new 'micro-credentials' in the AQF. ASQA is supportive of any steps which better align training to the needs of industry, noting however that ASQA is only able to regulate nationally recognised training.

ASQA is only able to regulate nationally recognised training, therefore new micro-credentials will need to be developed in accordance with nationally recognised training requirements (similar to skill sets and accredited courses), in order to be quality assured. Furthermore, VET trainers and assessors must hold legislatively prescribed qualifications to be able to deliver nationally recognised training. Therefore while ASQA notes however that the discussion paper indicates that the intention of the AQF Review is not to expand the scope of programs that are subject to regulation, some consideration should be given to quality assurance of these microcredentials.

Given ASQA's findings in its review of unduly short training, consideration should also be given to the inclusion of clear entry requirements or prerequisites, volume of learning specifications and exit specifications. This would help to prevent micro credentials being delivered in inappropriate timeframes or marketed inappropriately – especially if these micro credentials were to be 'stacked' or aggregated for recognition as part of a broader qualification or skill set. Special consideration may need to be given to the downstream impact of micro-credentials on other market segments, such as the international education sector.

Alternative approaches could see micro credentials defined by industry as pre-requisites or pathways into AQF qualifications; or be recognised by employers as continuous professional development (CPD), rather than being formally incorporated into the AQF.

Enterprise and social skills

ASQA recognises that there is a growing demand for enterprise and social skills (such as critical thinking, resilience and empathy), and employers seek graduates that hold these skills in addition to VET competencies. There are also benefits to learners in holding these employability skills as they are transferrable and can support movement between education and employment.

In its current form, the AQF includes limited guidance on enterprise and social skills, indicating that these are specific to different education sectors.

To increase the portability of these employability skills (and relevance to the learner), it may be worth changing this section to emphasise the transferability of these skills VET and higher education and different education fields (noting however that these employability skills will always be delivered within the context of the education field relevant to the course of study)

ASQA notes that the delivery and assessment of enterprise and social skills may be challenging, as there no universally agreed way of teaching and assessing these skills (noting however that the FSK - Foundation Skills Training Package does cover foundation enterprise and social skills). From a regulatory sense, it is difficult for ASQA to determine whether enterprise and social skills have been appropriately delivered and assessed, particularly if the learner cohort has limited interpersonal functioning, for instance.

AQF taxonomies and levels

The current taxonomy of levels within the AQF may be serving to diminish the importance of VET in post-secondary education. The Panel may wish to consider better positioning VET as a valuable aspect of the AQF and highlight the pathways and exit points that VET provides to students and

employers. The Panel has already recognised that the level of autonomy and responsibility achieved in some vocational qualifications is understated in the current AQF. ASQA supports the notion that autonomy and responsibility be incorporated into the AQF definitions.

The Panel may also wish to review the qualification types approved for delivery across different sectors. For example, Graduate Certificates and Graduate Diplomas are approved against different standards but can be delivered in both the VET and higher education sectors. More specificity may be required in the qualification type descriptors to differentiate between a Graduate Certificate applicable for accreditation by ASQA and delivered in the VET sector and a Graduate Certificate applicable for accreditation by TEQSA for delivery in the higher education sector. The specificity could highlight the differences in course entry requirements, professional disciplines that require university degrees and professional registration, as well as capability to assess and accredit a highly specialised or technical courses. These changes could be made within the current guiding principles of the AQF.

Finally, the 'vocational' distinction between the qualifications at Level 8 was removed from the AQF as part of previous reforms. The removal of the 'vocational' nomenclature from Graduate Certificates and Graduate Diplomas was advocated by industry, and received near unanimous agreement¹ from all stateholders at the time. Consequently, ASQA does not support any move to reintroduce the 'vocational' nomenclature within Level 8 qualification types.

Senior secondary school certificates

ASQA supports in-principle the proposed approach to revise the senior secondary school certificate, to recognise that the knowledge and skills acquired can be at a range of AQF levels and can result in multiple pathways for post-secondary skills acquisition.

Other

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¹ AQF Council, "Communique: Review of the Graduate and Vocational Graduate Certificate and Diploma types", August 2012.