



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

Council for International Education's Expert Members

Respondent organisation (where relevant)

Not applicable

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

- The AQF is recognised internationally as one of the hallmarks of Australian education and training. It serves as an integral and effective platform for international engagement, adding to our \$35 billion international education industry.
- The AQF has an important role in international education and is an essential component of Australia's regulatory framework for international education, including associated visa settings.
- The AQF is also an essential component of Australia's qualifications recognition policy, providing a benchmark for comparisons of foreign qualifications for the purposes of admission to study, employment and skilled migration. Australia is considered a world leader in qualifications recognition policy which serves as an enabler to student and worker mobility. This position is used to influence decision-makers internationally to fully recognise Australian qualifications, paving the way for greater market access for Australian education and training providers, and other

businesses. Eliminating unnecessary barriers in the recognition of Australian qualifications will help to grow and diversify this market.

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.

A number of specific issues being considered in the AQF Review have potential positive implications for international education, including:

Advocacy for a national credit system

- Australia's lack of a national credit system continues to impact on the international recognition and portability of Australian qualifications.
- Consideration of a national credit system in Australia would bring a range of benefits to international education, helping our global competitiveness.
- Key competitors, including the UK and the US, have credit systems which support student mobility and facilitate international partnerships.

Streamlining to remove duplication in AQF levels and qualifications descriptors

- Changes to the AQF that make it simpler, streamlined, and easier to understand will make the AQF more competitive internationally by adding to its attractiveness for countries seeking to engage with Australia.
- However, any streamlining should consider the needs of Australia's qualifications recognition policy, which relies on considerable detail to influence international decision-makers to fully recognise Australian qualifications.

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.

The AQF is an essential component of Australia's regulatory framework for international education and any changes should consider the broader impacts beyond the domestic education framework:

- Australia's visa settings provide us with a competitive edge to attract international education students. Australia's visa settings (for which the Department of Home Affairs is responsible), closely intersect with the Australian Government's regulatory framework for international education (of which the Department of Education and Training is responsible).
- To be granted a student visa, international students can only be enrolled in a course of study that is registered on the Commonwealth Register of Institutions and courses for Overseas for Overseas Students (CRICOS). Apart from a limited number of courses designed to help students meet course entry requirements, all other CRICOS-registered courses must result in an AQF qualification. Changing the AQF could therefore have unintended consequences in the granting of student visas and the international education sector.

¹ Education Services for Overseas Students Act 2000, National Code of Practice for Providers of Education and Training to Overseas Students, Commonwealth Register of Institutions and Courses for Overseas Students, Tuition Protection Service – all of which complement the national education regulators – TEQSA and ASQA.

- Potential changes to the AQF must therefore fully consider the impact on Australia's regulatory framework, including how it may affect the ability to provide certain courses and prospective student choice in study destination.
- The AQF is a highly regarded qualifications framework internationally, providing an effective tool for government-to-government engagement. It makes it easier for other countries to understand what level of education each Australian qualification represents.
- Government engagement is necessary to pave market access opportunities for Australian education and providers. Potential changes to the AQF should take into account the international standing of the AQF, including factors that might affect its primary purpose and its overall usability and level of complexity.

A number of other specific issues being considered in the AQF Review have potential implications for international education:

Inclusion of shorter form credentials in the AQF:

- Australia's international education framework is designed around students studying full-time qualifications. Changes to encourage microcredentials may not fit comfortably within that framework and could require significant legislative, policy and administrative change, including increased administrative and regulatory burden for education and training providers.
- There may also be unintended reputational concerns relating to perceptions of diminished standards should short courses be included in the AQF in the same way as full qualifications.
- Due consideration should be applied to potential consequences stemming from student visas being granted for a microcredential course of study. This is a current concern as the department considers ways to make it easier for international students to undertake short courses such as first aid without compromising the integrity of student visa policy.
- Consideration also needs to be given as to how microcredentials would interact with Australia's obligations under the international student Tuition Protection Service.

Including Senior Secondary Certificate of Education

- The SSCE is a stand alone qualification in its own right within the Australian education and training system. Assigning it to an existing AQF level may diminish its understanding and value internationally, as well as that of other AQF qualifications should it be situated on the same AQF level(s). International school students undertake the SSCE to continue to various study pathways – including both VET and Higher Education.

Redefining principles of Volume of Learning

- Volume of learning is a key component of the AQF used within Australia's regulatory framework for international education. Changes to principles of volume of learning would need to be considered in the context of broad systemic implications across the education and training sector.
- Changes to principles of volume of learning would also have implications for the assessment and comparison of Australian qualifications internationally.

Overseas governments focus on duration of the course when making comparisons, factors that are captured by the AQF.

- Volume of learning helps to differentiate qualification types more distinctly and provides a user-friendly quality indicator of learning to international stakeholders, including decision-makers for qualifications recognition.
- Any changes to the way volume of learning is reflected in the AQF could impact the way international governments assess and recognise of Australian qualifications.