

— Submission

Review of the Australian Qualifications Framework

Submission From The
Australian Council for Private Education and Training

ACPET is the peak business organisation representing
independent providers in the higher education and
vocational Education and Training (VET) systems.

Introduction —

The Australian Council for Private Education and Training (ACPET) is the peak business organisation representing independent providers in the higher education and vocational education and training systems. ACPET tenders this submission to the Australian Government undertaking the Review of the Australian Qualifications Framework.

Section 1	Executive Summary.....	Page 3
Section 2	Recommendations	Page 4
Section 3	The AQF and Changes in Tertiary Education.....	Page 5
Section 4	One Tertiary Education System	Page 6
Section 5	New Thinking Required in Qualification Development ..	Page 8
Section 6	Reducing Regulation	Page 10
Appendix A	ACPET Introduction	Page 11
Appendix B	Abbreviations	Page 12

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Section 1: Executive Summary—

The Australian Council for Private Education and Training (ACPET) is the peak business organisation representing independent providers in the higher education and vocational education and training (VET) sectors.

ACPET members make a significant contribution to education and the economy and are representative of the independent sector that delivers training to over three million students a year, with a workforce of some 100,000 people.

Independent providers deliver around 60% of all VET student enrolments nationally, about 90% of international student VET enrolments and are growing higher education enrolments at over 10% per year, with student satisfaction rates equal to those of public sector TAFE colleges and universities.

In delivering to 60 per cent of all VET students, some 3,156 independent training providers deliver training across the country to meet the needs of students and employers (NCVER, Total VET Students and Courses 2017).

The education of international students is Australia's third largest export. The independent sector plays a significant role in Australia's international export market with 126,000 international students studying onshore, offshore or a mixture of both. Importantly, 70 per cent of the total number of Australia's international students chose to study at an independent provider (NCVER International students, 2017).

In preparing this submission ACPET has consulted widely with its members. In addition, ACPET has had the opportunity to previously put its views forward at a series of workshops held around the country in capital cities and major regional centres. A number of ACPET members attended these sessions.

The Review of the AQF comes at a time when both the Government (through the Joyce review) and the Labor opposition (through their election policy) are seeking to review tertiary education in Australia. The AQF review must take into consideration these reviews where practicable.

ACPET tenders our thanks for the opportunity to make this submission and we look forward to further engagement on this matter.

Troy Williams
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Section 2: Recommendations

This section lists the recommendations made throughout ACPET's submission to the Review of the Australian Qualifications Framework.

1. The AQF is designed to promote one tertiary education system in Australia and supports seamless movement within tertiary education for students.
2. The AQF does not imply a hierarchical approach to VET and higher education and recognises that learning at any level is beneficial to a student depending in their career aspirations.
3. The AQF must provide the foundation for qualification development and qualifications must be developed within the AQF and be suitable for use.
4. The AQF should be aligned to international frameworks where appropriate to support the movement of labour and skills, both into and out of Australia.
5. The AQF should support the development of Australia's third largest export industry and to grow our international competitiveness to attract more students into Australia's tertiary education providers.
6. The AQF provides opportunities to define shorter form credentials and transferable skills that are increasingly being demanded by students and employers.
7. The AQF clarifies issues around dual sector qualifications, particularly at levels 5, 6 and 8.
8. The AQF should be simplified to encourage a reduction in red tape in vocational education and training and higher education.

Section 3: The AQF and Changes in Tertiary Education

The Australian Qualifications Framework (AQF) puts senior secondary school, vocational education and training (VET) and higher education qualifications into a single, national framework.

The AQF has 10 levels that include descriptions of learning outcomes in terms of knowledge, skills and their application at increasing levels of complexity. It describes 14 qualification types. All qualification types except the senior secondary certificate of education are assigned to a level in the 10-level structure.

Since the last AQF review, there have been significant changes to tertiary education, including:

- National regulators for VET and higher education have been established
- New and improved ways of teaching, learning and assessment have been developed
- There are ongoing increases in educational attainment, particularly at the tertiary level
- Growth in demand for skills sets and micro credentials
- Significant differences in funding and enrolments in VET and higher education.

ACPET's view is that any changes to the AQF should seek to simplify rather than add additional layers to an already complex and changing post-schooling education system.

Section 4: One Tertiary Education System

Key Issues —

The vocational education and training system has become the poor cousin to the university sector over the past 20 years. Real decreases in funding, confusing governance arrangements, substantial differences in jurisdictional policies and approaches to funding have undermined the national training system. Essentially, Australia has eight VET systems with a lack of national leadership.

There is no longer a vision at the Commonwealth level shared by the states and territories. There is confusion around the governance of VET, with numerous funding programs at both Commonwealth and state and territory levels all with different compliance and contract management overheads and red tape.

VET and higher education providers have essentially been operating in silos, with the former administered by states and territories and the latter by the Commonwealth. This has led to a situation where funding levels for higher education are greater than VET, and a demand driven system is available to higher education students but not available to all VET students.

There is a need to change the nomenclature around VET and it is time for new conversations to reflect one post schooling system.

Australians would benefit from the introduction of one national tertiary education system where VET and higher education providers are treated equally but are still able to keep their respective identities.

The AQF can play a major role in supporting one tertiary system through the removal of implied hierarchal structures within the AQF, which has led to funding models which support those qualifications at the top more than those at the bottom.

Recommendation/s —

1. The AQF is designed to promote one tertiary education system in Australia and supports seamless movement within tertiary education for students.
2. The AQF does not imply a hierarchical approach to VET and higher education and recognises that learning at any level is beneficial to a student depending in their career aspirations.

Section 5: New thinking required in qualification development

Key Issues —

Training packages provide for national competency-based qualifications. Qualifications in training packages can be at certificate I, II, III, IV, diploma, advanced diploma, vocational graduate certificate, or vocational graduate diploma level.

Training packages are made up of nationally endorsed components comprising:

- Units of competency: which specify the knowledge and skill, and the application of that knowledge and skill to the standard of performance required in the workplace.
- Qualifications: which are created by packaging units of competency into meaningful groups to form qualifications in accordance with the Australian Qualifications Framework.
- Assessment guidelines: which provide an industry-led framework for assessing competency in the specified industry, industry sector, or enterprise.

Training packages are not curricula. The learning and assessment strategies (the 'how' of training) are developed by providers based on learner needs, abilities and circumstances. These take time to develop, implement and refine (and are not without resource and financial cost at provider level).

ACPET believes there is an opportunity to review the current arrangements to how qualifications are developed. There are instances where qualifications being developed are across multiple Australian Qualifications Framework (AQF) levels making them very difficult to assess. ACPET is concerned that performance criteria must be achievable and manageable. Also of concern is members are reporting that current multiple units are being combined into some very large units of competency that will be difficult to deliver and assess.

The AQF must provide the foundation for qualifications and correspondingly the development of teaching and learning strategies. Too many new qualifications and qualifications currently in development are ignoring the AQF. There are cases of assessment levels at AQF level 5 and above being written into Certificate III level qualifications. Greater attention to the AQF must be considered in the development and approval of qualifications.

A changing labour market requires new thinking in qualification design

The impact of technology on all jobs is occurring faster than the qualification framework can respond. There is a demand from employers and students for shorter courses and industry recognised programs that quickly fit new jobs.

Micro-credentials are already becoming a feature of the sector to increase employability and to build the skills and behaviours required by the labour market.

This is occurring now, with students undertaking only the units of competency they require to gain the skills or licencing requirements to be able to work in their chosen industry, rather than entire qualifications.

New educational programs must introduce students to specialised knowledge and skills, and in addition, support development in soft skills such as problem solving, critical thinking and communication to support students be successful in the workplace.

While qualification completion remains an important principle, in reality students are already coming and going from the sector as they need, without a focus on completing a qualification. While governments and educators see completion as the system's benchmark, non-completers are reporting satisfaction at record levels in terms of the purpose for which they enrolled.

Increasingly, students are working in a globally competitive world and in many cases their work is not constrained by state and national borders. The AQF should be aligned to international frameworks where appropriate, particularly in Europe and Asia, to support the movement of labour and skills, both into and out of Australia.

In addition, the AQF should support the training of international students and for students and to have their knowledge and skills recognised in a global marketplace. The AQF should support the development of Australia's third largest export industry and to grow our international competitiveness.

Opportunity to clarify issues around dual sector qualifications

There are both VET and higher education qualifications at AQF levels 5, 6 and 8.

The PhillipsKPA's report states that users find that the AQF descriptors are unclear. Some terms are ambiguous, skill descriptors are applied inconsistently across levels or qualifications, differences between levels are unclear and sometimes terms are used at lower AQF levels that imply greater complexity than terms used at higher levels.

ACPET believes that the review provides an opportunity to revise the descriptors to simplify them and ensure clear distinctions between the various categories.

Higher Education Providers Funding

While funding is not an issue for the AQF review, it is important to note that the 25% administration fee applied to higher education providers and independent VET providers is a red tape burden that unfairly impacts on the independent sector. It could be argued that independent providers undergo a much more rigorous and independent process of accreditation through the TESQA and ASQA than public providers.

ACPET recommends that any changes to the AQF should not be used as a basis for funding models within tertiary education.

Recommendation/s —

3. The AQF must provide the foundation for qualification development and qualifications must be developed within the AQF and be suitable for use.
4. The AQF should be aligned to international frameworks where appropriate to support the movement of labour and skills, both into and out of Australia.
5. The AQF should support the development of Australia's third largest export industry and to grow our international competitiveness to attract more students into Australia's tertiary education providers.
6. The AQF provides opportunities to define shorter form credentials and transferable skills that are increasingly being demanded by students and employers.
7. The AQF clarifies issues around dual sector qualifications, particularly at levels 5, 6 and 8.

Section 6: Reducing Regulation

Key issues -

Independent tertiary education providers play an important role in ensuring the diverse needs of students, industry and the Australian economy are met. Independent providers enjoy high levels of student satisfaction on par with publicly funded institutions. Recent failures in the sector have largely been due to flawed government-funded program design and implementation and the failure to administer existing regulations, together with a lack of ethics in a small number of providers.

Federal and state and territory governments have 'doubled down' on regulation in response to their program administration failures and these have had a significant impact on the sector, its students and employers who rely on the sector for their training needs.

ACPET members report that the VET sector is experiencing the most challenging regulatory environment over the last 25 years. The raft of recent federal and state and territory government regulatory measures (and funding restrictions, particularly to the independent sector) are significantly adding to the burden on quality independent providers, their students and industry.

Regulatory arrangements need to be overhauled to ensure proper engagement with regulated entities with a focus on delivering improved results for students and employers.

ACPET and its members support measures that protect the interests of their students and drive poor performers from the sector. ACPET has a keen interest in ensuring only the very best providers enjoy the privilege to train and educate our young people and others to meet their career aspirations and the needs of business and industry.

Recommendations

8. The AQF should be simplified to encourage a reduction in red tape in vocational education and training and higher education.

Appendix A: ACPET Introduction

The Australian Council for Private Education and Training (ACPET) is the peak business organisation representing independent providers in the higher education and vocational education and training (VET) sectors.

ACPET members make a significant contribution to education and the economy and are representative of the independent sector that delivers training and knowledge to over 3,000,000 students a year, with a workforce of some 100,000 people. Independent providers deliver around 60% of all VET student enrolments nationally, about 90% of international student VET enrolments and are growing higher education enrolments at over 10% per year. Student satisfaction rates are equal to or better than those of public sector TAFE institutions and universities. In this context ACPET's projects and policy priorities are directed within the following framework:

ACPET's Vision —

ACPET is recognised internationally as leading the quality provision of skills and knowledge for the future by ethical, independent providers of Australian tertiary education.

ACPET's Mission —

To position the independent sector as leaders of quality and innovation in Australian tertiary education.

A major focus for ACPET is to support providers in the higher education and VET sectors reach export markets, whether this be for students undertaking study within Australia or at off-shore campuses of Australian tertiary education providers.

Policy advocacy at ACPET uses the experience of our members to work towards a regulatory framework for the VET sector that is based upon a risk management approach that ensures independent providers can deliver quality training outcomes while at the same time freeing business from a regulatory burden that makes little or no demonstrable contribution to quality improvement.

ACPET's head office is in Melbourne and the organisation operates nation-wide with staff located in Adelaide, Brisbane, Darwin and Sydney. ACPET's policy advocacy and research team is located in Canberra.

For further information visit the ACPET website at:
www.acpet.edu.au

Appendix B: Abbreviations Used in this Submission

ACPET	Australian Council for Private Education & Training
AQF	Australian Qualifications Framework
ASQA	Australian Skills Quality Authority
TEQSA	Tertiary Education Quality and Standards Agency
VET	Vocational Education and Training

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