



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

Peter Lausberg

Respondent organisation (where relevant)

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

Fit for purpose in that it provides a well ordered structure of formal Australian qualifications. It has allowed some measure of quality assurance auditing to be conducted by regulators.

As a national reference point it has united the language of qualifications so that parents, students, employers and educators have the same 'accent' making career planning communication more easily understood.

The AQF has not recognised the realities of established learning practices in the three sectors.

What is not working is that the specific language used to explain the three main sectors, school, vocational education and training and university place in the AQF is too generic

and not aligned to the language of each sector. Senior school exit qualifications, VET qualifications between Certificate I and Advanced Diploma, and tertiary AQF levels 7 to 10 all have specific language and requirements that may overlap but are also distinct from each other.

The AQF is generic where it needs to be specific. The opportunity to provide a national language set that is friendly and adoptable by the three sectors has not been seized. The compromise language is causing issues for quality assurance and compliance practices. Additionally, the concept of the AQF as being voluntary in some sectors but not in others has created a weakness in an otherwise sound system.

Fairness demands recognition through appropriate and equitable accomplishment descriptors. A student undertaking a Certificate III Business has a comparable AQF recognition to a student undertaking a Certificate III in Commercial Cookery done as an apprenticeship. The applied and theoretical learning requirements are substantially different, but both are AQF 3. Applied learning has been notionally demoted by the AQF and the consequences are that VET qualifications are perceived by some as the attainment of lower value skills and knowledge, providing 'suitable' recognition for learners with limited abilities, challenged by more complex thinking and application.

AQF certification policies also stumble in providing coherency of language concerning certification. A common certification language, devoid of ambiguities can provide a reliable and valid measure against fraudulent reproduction of achievement documentation. The VQF must currently publish additional clarifying schedules on how the AQF policies on certification, issuance and registers are applied in the VET sector and even then these do not cover all aspects of the AQF policies and use compromise language and varagies around practical implementation

The AQF all but ignores one of the largest structures in the VET sector, Training Packages which quantify and qualify qualifications and units of competency in a national register (TGA). An added complication is that the national data collection standard (AVETMISS) uses language with a different 'accent' to Training Packages, VQF AQF and the Standards fro RTOs. The 'brogue' is sufficient to affect cohesion of users understanding of national practices.

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.

1. Allow the AQF to become dynamic an responsive to change and innovation across the sectors it services. Avoid generic language the interpretation of which is dependant on the sector. Have scheduled and regular reviews that seek to adjust the framework to the developing educaton environment and the other dynamic components of the national learning structure.

2. Align the language to the sectors of use. Schools, VET, Tertiary.

3. Align the policies to realistically address each sector's requirements. An issuance policy is likely the only essential policy needed in addition to framework statements.

Deleted other policies and build them into the framework.

4. Make the AQF realistic and fair. Seek greater cooperation with the main players to align training and education products to the frameworks requirements.

5. Formerly recognise the place of traineeships and apprenticeships as being substantially different from learning programs that are not so completely dependant on the symbiosis of skills and knowledge with practical their application in a workplace.

6. As in the VET sector, legislate the AQF as a truly national system.

7. Remove unhelpful components of the AQF. Volume of Learning has brought the AQF into disrepute fo its unrealistic attempt to be generic. Registers. Reduce the verbosity of the framework and use plain English.

8. Provide exemplars of certification.

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.

Consult more specifically with issuers of certification. Schools, RTOs and Universities.

Consult with regulatory audthorities. ASQA, QCAA, ACACA, Boards of Studies that are involved in quality assurance or regulatory activities

Implementation through legislation is preferred.

Implementation should not be retrospective, should not be voluntary, should be national.

Other