



**Hon Sue Ellery MLC
Minister for Education and Training
Leader of the Legislative Council**

Our ref 61-16019

Professor Peter Noonan
Chair
AQF Review Panel

Email. AQFReview@education.gov.au


Dear Professor Noonan

Thank you for the opportunity to respond to the Review of the Australian Qualifications Framework (AQF) discussion paper

The Western Australian Government recognises the importance of the AQF as a lynchpin of the education and training sectors, supporting secondary school, vocational education and training (VET) and higher education

Feedback on the proposed approaches outlined in the discussion paper is attached, including an individual response from the Western Australian VET regulator, the Training Accreditation Council, as requested

Western Australian looks forward to continued engagement in the AQF Review through the COAG process and via our representation on the Skills Senior Officials Network and the Australian Education Senior Officials Committee

For further information, please contact Ms Karen Ho, Western Australia's Skills Senior Official representative by telephone on (08) 6551 5380 or email at Karen.Ho@dtwd.wa.gov.au

Yours sincerely


**SUE ELLERY MLC
MINISTER FOR EDUCATION AND TRAINING**

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✓Att

Western Australian Government submission to the Review of the Australian Qualifications Framework (AQF)

This submission has been compiled by the Department of Training and Workforce Development, in consultation with the Western Australian Department of Education, Department of Jobs, Tourism, Science and Innovation, Schools Curriculum and Standards Authority, TAFE colleges and Catholic Education Western Australia

The submission from the Western Australian VET Regulator, the Training Accreditation Council, is provided in its entirety (Attachment 1), as requested by the AQF Review Panel. Please note the main submission does not include specific feedback from the Council

General feedback – fit for purpose

Current

- Overall, the Australian Qualifications Framework (AQF) is well established, internationally recognised, fit for purpose and intrinsically embedded in the education and training sector.
- The AQF.
 - ensures qualifications and student outcomes from the Senior Secondary Certificate of Education (SSCE) through vocational education and training (VET) and higher education (HE) are defined consistently across Australia and recognised internationally;
 - provides the flexibility to allow each sector to implement the framework within its legislation, standards, funding, governance and specific product development opportunities,
 - is a valuable framework for guiding consistency and the integrity of nationally endorsed training products, and
 - is essential for international education as the accreditation that underpins the quality of the Australian education system, providing a competitive difference in the global market place.
- Aspects of the AQF are very much entrenched and understood by many, in particular those who develop training products, deliver training, and design and implement assessment

Review of the AQF

- The AQF should remain as a single framework for nationally recognised training in Australia
- However, adjustments to some aspects of the AQF are necessary to ensure clarity, practical applicability and relevance to each sector
- The review of the AQF is an opportunity to provide more coherence across and between sectors, which will make the transition easier for students
- Any proposed amendments should.
 - aim to reduce or remove duplication and confusion;
 - result in a framework that is easily understood and can be applied by each sector and its practitioners;
 - not increase regulatory burden or cost to training providers, governments, students or schools,
 - support the longevity of the AQF, and
 - take into consideration the potential impact on funding and industrial relations issues for states and territories.

Areas for possible change and implementation issues

Shorter form credentials

Current

- Stakeholders recognise the value of shorter form credentials as a means of meeting the needs of a wide range of students.
- For example, skills sets and short courses can help meet the needs of secondary students in remote areas, those attending Curriculum and Re-Engagement Education (CARE) schools and students with disabilities.
- Micro-credentialing can also build on previous qualification(s) achievement to help ensure high quality skills development which will keep the Western Australian workforce technologically relevant, capable, competitive and employable
- A number of mechanisms are already in place to recognise shorter form credentials in the education and training sectors
- These include:
 - the flexibility embedded in training packages to allow the choice of units of competency to suit employer needs,
 - well established processes for developing, endorsing and recognising skill sets and 'course in' accredited courses within the VET sector; and
 - recognition arrangements of shorter form credentials within SSCE. For example, the School Curriculum and Standards Authority (the Authority) determines a limited unit equivalence for shorter form credentials, as Endorsed Programs, which contribute towards the achievement of the Western Australian Certificate of Education (WACE).
- The Authority notes that shorter form credentials are most effective in a senior secondary certification context where they
 - are relevant to the broad aims of the certification, including to provide students with opportunity to develop a range of skills and understandings for post-school pathways,
 - contribute towards the achievement of SSCE, and
 - are regulated to ensure quality outcomes for students.

Proposed approach and implementation

- There is a growing demand for more personalised, accessible, shorter courses or components of courses, such as skill sets
- Formalising the recognition of these within the AQF structure will allow Australia's workforce to be more agile and have greater mobility when navigating employment and learning.
- However, full qualifications should remain the cornerstone of the AQF, particularly for school leavers and young people, as entry into occupations are generally guided by full qualifications, not skill sets.
- Stakeholders support consideration of a wider range of nationally recognised and quality assured credentials in the AQF including skill sets and micro-credentials
- Of note, the recognition and appropriate classification of skill sets would create a nationally consistent evidence base for analysis, research and policy development of course data Current training package skill sets are coded to Level of Education '991' (Statement of Attainment Not Identifiable by Level), grouping thousands of individual skill sets into one vague collection Allocating a Level of Education Identifier¹ to each skill set, reflecting the AQF level of the Statement of Attainment that would be issued when the skill set is successfully completed would resolve this issue.

¹ The Australian Standard Classification of Education (ASCED) 2001 already includes individual identifiers for Statements of Attainment by AQF level (as distinct from full qualifications) for 'partial completion of a course' or 'attainment of competencies within a Training Package which may contribute towards a qualification' at a specified level The Level of Education Identifiers could be allocated to individual skill sets by IRCs, with reference to the pathway(s) or AQF level(s) specified in the skill sets A simple business rule would ensure that in instances where multiple pathways are identified, identifiers are allocated consistently

- Any proposals to include shorter form credentials in the AQF will need to consider.
 - the use of the minimum requirements/existing criteria to determine their inclusion in the AQF,
 - the capacity of sector regulators, curriculum and assessment authorities to undertake additional quality assurance or regulatory work, and
 - any potential legislative impact nationally and at a state/territory level and/or changes to regulatory standards
- It was not considered necessary to include all shorter form credentials or types of courses, for example, professional and vendor specific courses and lifestyle or personal interest training courses, within the AQF

Enterprise and Social Skills

- Stakeholders recognise that enterprise and social skills are developed more effectively within the vocational context of the qualification/industry area and when the learner's needs have been taken into consideration.
- Stakeholders support:
 - incorporating enterprise and social skills within the AQF;
 - providing guidance on contextualising the delivery of these skills for the industry or qualifications and for various learner cohorts,
 - not having a mandatory list of these skills and therefore not adding another layer of taxonomy and complexity; and
 - a mapping for commonality across the various frameworks, standards or reports that currently include enterprise and social skills across the sector(s), such as the generic skills in the AQF, the Australian curriculum requirements, training package requirements, future skills and the 21st century skills.

AQF taxonomies and levels

Current

- The current descriptors are based on a hierarchy that favours HE qualifications and does not recognise the complexity of skills and knowledge within the VET sector.
- Anomalies at certain AQF levels have been well documented, including:
 - the lack of comparability between many trade and non-trade Certificate III qualifications in terms of complexity, depth of knowledge, training outcomes and duration, and
 - the disparity between Certificate II qualifications with a 'prevocational' outcome and those with clear employment outcomes

Proposed approach and implementation

- The review of the AQF presents an opportunity to contribute towards a shift in perceptions about the relative nature of VET qualifications by reviewing the descriptors to be more reflective of autonomy and responsibility achieved by graduates with these qualifications.
- Stakeholders support:
 - reviewing the "application of knowledge and skills" domain and how it could be applied across the AQF levels if separated from the individual skills and knowledge criteria;
 - reviewing the descriptors for:
 - lower AQF levels to reflect their prevocational outcomes, taking into account the different outcomes and intentions of Certificate II qualifications and the changing attitudes of industry regarding entry-level qualifications and corresponding knowledge and skills, and
 - Certificate III and above AQF levels to be more reflective of the autonomy and responsibility achieved by graduates with these qualifications;
 - further investigation of a non-hierarchical increase to descriptors at AQF level to remove duplication and confusion; and

- refinements to the AQF taxonomy to allow for greater discrimination between gradated descriptors, noting the language used should:
 - not discriminate between VET and HE, and
 - recognise relative complexity in some lower AQF levels is comparable, in some instances, to higher AQF levels in certain disciplines. It is noted that it is not uncommon for reverse articulation to occur.
- The impact of any changes to the AQF taxonomy and descriptors will need to be carefully assessed, and state and territory education and training authorities consulted, before there are any significant changes to these aspects of the AQF
- Of note:
 - The AQF's easily identifiable education classification levels are fundamental to the assessment process for post-secondary studies completed overseas undertaken by the Department of Training and Workforce Development. As the AQF is nationally recognised, the community, employers, institutions and government departments accept these assessments. Significant changes to the AQF may initially increase the workload, duration and complexities of assessments conducted to compare overseas qualifications.
 - State and federal industrial awards for apprenticeships and traineeships are linked to AQF levels or qualifications. The awards specify the condition of employment and wage rates. Any changes to the level of an AQF qualification for an apprenticeship or traineeship would need to be reflected in the industrial award, which may have a financial or legal impact.

Senior secondary certificates of education (SSCE)

- In Western Australia, senior secondary school students may undertake VET qualifications ranging from AQF Level 1 to Level 5, and courses of varying complexity, to achieve a WACE
- The complexity of different courses undertaken by students during their senior secondary schooling, the extension of compulsory education years to Year 12 and the incorporation of life-long learning, present challenges in aligning the SSCE to a particular AQF Level.
- Consideration of how the SSCE articulates to further education and training should include a distinction between the outcomes of secondary curriculum and the outcomes of various additional components such as VET qualifications or tertiary units that contribute towards the SSCE credential
- Stakeholders support the review of the SSCE descriptor to reflect the range of outcomes and pathways resultant of its completion but not align it to any one level

Volume of learning

- Volume of learning provides guidance of breadth, depth and complexity of the learning outcomes for course developers, designers and accreditation bodies, and information to assist in benchmarking and risk management for regulators.
- Volume of learning and its purpose is still a confusing dimension for many, complicated by the application of the AQF across the school, VET and HE sectors
- It is recognised the actual amount of training provided to individual students by registered training organisations (RTOs) is personalised, based on factors such as previous training, existing skills and knowledge, personal attributes and mode of delivery.
- However, in recognition of the broader application of this measure, the majority of stakeholders support retaining volume of learning as a guide, and are concerned that removing any guidance to volume of learning may lead to undesirable behaviour
- Stakeholders do not support the measurement of volume of learning from years to hours as.
 - hours are used in various other measures, such as amount of training (as mandated by the *Standards for Registered Training Organisations 2015*), nominal hours for funding and work placement hours,

- years has a broader understanding, as the public would not understand the difference between classroom time and self-paced work time,
- workplace agreements often refer to years, and any changes to volume of learning measurements may have downstream consequences;
- the AQF already has guidance that one year of study is equivalent to 1200 hours,
- use of hours may have the unintended consequence of increasing the duration of some courses, which may then dissuade particular cohorts from participating, and
- shifting to hours for the purpose of implementing a credit points system should not be considered, prior to further review of the merits of an hours based recognition process.
- While the discussion paper identifies that measuring volume of learning in years is problematic, due to the shifts in delivery mode away from traditional classroom learning and semester-based courses, measuring in hours may also be challenging and confusing. Mode of course delivery should not be a consideration under the AQF as it is the framework for qualifications across sectors
- Stakeholders support the shift to 'new' learner as a better baseline measure than trying to describe a 'typical' learner. Irrespective of the definition used to define 'learner type' the concept of volume of learning in the AQF will continue to be complicated

Credit point system

- Stakeholders support future work to investigate a credit point system to replace volume of learning, recognising the benefit this may bring for students to understand the value of their qualification and ensure consistency across providers
- This could be linked to, or sit alongside, the AQF but should not be a part of the framework
- Consideration will need to be given to:
 - the comparability of credit, recognition of prior learning (RPL) or recognition of current competency in the context of the qualification and/or industry area,
 - any unintended consequences arising from the introduction of such a scheme, including a further reinforcement that VET is of a lower value to HE,
 - the impact of an optional system on provider and student behaviour,
 - if a credit point system based on hours of learning is the most appropriate model given the documented issues with qualification outcomes at particular AQF levels, for example, trade and non-trade Certificate III qualifications, and the availability of different delivery modes, including on the job training and self-paced learning; and
 - any potential system and administrative issues that would need to be addressed to introduce the scheme.

AQF policies

- As credit is inconsistently applied between sectors and institutions, stakeholders support further exploration of a credit transfer register for consistency across sectors and institutions, though this will be costly and difficult process.
- Also supported is
 - a review of the policies in the AQF to determine if they should be removed, retained, updated or separated to provide guidance, and
 - an updated format of the National Principles and Operational Guidelines for RPL (AQF 2007).
- A review of the policies should consider the practicality, consequences and any linkages to other policies, standards or requirements within sectors, including international implications



**Response to 'Review of the Australian Qualifications Framework:
Discussion Paper December 2018'**

Introduction

The Training Accreditation Council (TAC or Council) is Western Australia's registering and course accrediting body, responsible for the quality assurance and recognition of vocational education and training (VET) services in WA. The Council operates within an agreed national VET regulatory framework defined in a set of standards, guidelines and policies aimed at achieving national consistency in the way RTOs and accredited courses are registered and monitored

The AQF intersects with the *Standards for Registered Training Organisations (RTOs) 2015 (Standards for RTOs)* and the AQTF2007 Standards for Accredited Courses. The Council ensures:

- RTOs meet compliance requirements set out in the *Standards for RTOs*; and
- course developers meet compliance requirements set out in the AQTF2007 Standards for Accredited Courses in regard to course design and development

Intended audience

The AQF is well established and embedded in the VET landscape and is a valuable framework for guiding consistency and the integrity of nationally endorsed training products. It ensures qualifications ranging from the Senior Secondary Certificate of Education through to PhD are defined consistently across Australia

Overall, the Council agrees that the AQF is fit for purpose, noting that sectoral differences means that adjustments across some aspects of the AQF are necessary to ensure clarity, practical applicability and relevance to each education and training sector.

1 Language and definitions

Currently, the AQF applies across all three education and training sectors (schools, VET providers and universities), however there are instances of language and definitions that are more relevant to the university sector than to the VET sector, resulting in some confusion in their application in VET. For example, the AQF Qualifications Pathways Policy (pp.77-80) on credit arrangements negotiated for students towards a higher level AQF qualification in the same or a related discipline only appear to relate to Diplomas, Advanced Diplomas or Associate Degrees linked to three or four year Bachelor Degrees

Further, the percentages of credit specified (p 79) have little practical application in VET, as most of the credit granted in the VET sector is primarily between RTOs and usually for units of competency or whole qualifications completed. RTOs also find terminology such as "block, specified or unspecified credit" (p 79) confusing as these terms are not familiar within VET

The Council suggests the AQF review includes an assessment of the language and terminology used in AQF documentation and that definitions are segmented by sector.

2. Senior Secondary Certificate of Education

The AQF currently includes specifications for the design and accreditation of the Senior Secondary Certificate of Education, however these are not linked to a level within the

AQF For national consistency, it may be reasonable for this component to remain in the AQF, however education sector stakeholders are better placed to provide comment

3 **Single tertiary sector - the debate**

The AQF Review Discussion Paper (Discussion Paper) states that the “...AQF could provide further support for a more coherent tertiary system, but funding and governance systems would need to be re-examined for the benefits of the AQF to be fully realised ” and notes the “ .ongoing growth in VET courses as part of senior secondary certificates”².

The notion of a single tertiary sector is yet to be fully or formally examined With the debate primarily focussed on centralisation of funding mechanisms, broader policy and governance frameworks would need to be properly explored through a coordinated and comprehensive review process Any resulting actions may then inform how the AQF may support a single tertiary sector model.

The AQF is well established

The AQF should remain as a single national framework for nationally recognised training in Australia Aspects of the AQF are very much entrenched and understood by many, in particular for those required to develop training products, deliver training and design and implement assessment. These elements are further described below and demonstrates the practical application of the AQF from the VET Regulator’s perspective

o **Assessment - design and development**

RTOs are a key consumer of the AQF, as their training and assessment strategies, including the design and development of assessment instruments, must be consistent with the AQF level for the qualification Further, the certification RTOs issue to learners must comply with the AQF Issuance Policy

During audits, TAC auditors review RTO training and assessment strategies and assessment systems, including assessment instruments In the design and development of assessments, the RTO must have regard to the AQF level for the qualification

It should be noted that units of competency do not specify AQF levels Where single units or clusters of units are delivered, RTOs must rely on the unit content to determine appropriate training and assessment strategies.

There was a time however when the AQF level was specified within the unit code This supported and strengthened consistency in delivery and assessment practices and removed any subjectivity about the level required From a compliance perspective, it was easier for RTOs to meet, and for VET regulators to audit Clause 1 8b of the *Standards for RTOs* (valid and reliable assessment)

Inferring the AQF level from the qualification in which a unit is embedded is a complex process, particularly where units are contained across multiple qualifications - ‘BSBINM301 Organise workplace information’ appears in 45 qualifications across 12 Training Packages; ‘HLTFA301C Apply first aid’ appears in 173 qualifications across 18 Training Packages

In the context of how shorter form credentials may be recognised in the AQF, the Discussion Paper acknowledges potential difficulties³, so it will be important to consider how the shorter form credential may appropriately align with the AQF in terms of the

² Review of the Australian Qualifications Framework Discussion Paper, December 2018, p10

³ Review of the Australian Qualifications Framework Discussion Paper, December 2018, p16

quality of VET training and assessment, and to the status and credibility of VET outcomes

o **Accreditation - course development and design**

In VET, accredited courses fill a gap in skills requirements for industry, enterprise and the community that are not covered by national training package products. VET accredited courses may be developed by individuals, RTOs, industry, enterprise community and/or professional groups.

The AQF assists course developers to make decisions about the depth, breadth and complexity and the appropriate AQF level for their proposed program of learning

For course accrediting authorities (VET Regulators), the AQF provides a valuable framework for considering the appropriateness of the AQF level of courses presented for accreditation.

The TAC's Auditor Panel includes accreditation reviewers (auditors who are course accreditation specialists) They review course accreditation applications to determine whether the AQTF2007 Standards for Accredited Courses have been met before TAC considers applications for endorsement.

Prioritise and target key areas

The AQF review is an opportunity to further streamline complex issues aligned to the regulation of training providers and course accreditation This can be achieved through prioritising and targeting key areas with the aim to limit changes

Any amendments should also aim to reduce or remove duplication and confusion and result in a framework that is easily understood and applied by each sector and their practitioners.

It is TAC's view that the AQF review should prioritise the following key areas

- Volume of learning
- Recognition of units and skills sets
- Consolidation of explanatory documents
- Taxonomies and levels

These are further described below and explains the Council's perspective on considerations and impacts

1 **Volume of learning**

Volume of learning is defined in the AQF as identifying the notional duration of all activities required for the achievement of the learning outcomes specified for a particular AQF qualification type.

The Discussion Paper proposes to change the volume of learning unit of measurement from years to hours⁴ Across the VET sector, hours usually relate to the funded components of the training product and does not usually include time spent by a learner undertaking unsupervised individual activities like assignments and projects. Changing the unit measurement of volume of learning from years to hours may be considered restrictive and has the potential to cause confusion and provoke conflicting messages by derailing the focus from a competency based setting to a time-based model

As required under the *Standards for RTOs*, RTOs already have training and assessment strategies and plans which document the range of learning and assessment activities

⁴ Review of the Australian Qualifications Framework Discussion Paper, December 2018, p30

associated with the training products on their scope of registration. These strategies are expected to be living, working documents that are reviewed and amended to suit diverse learner cohorts and industry requirements. In practice, quality training organisations are already determining the appropriate duration of training based on consideration of the amount of training (*Standards for RTOs*, Clause 1.1, 1.2)

Delivery of VET programs in very short timeframes, when not sufficiently justified, clearly jeopardises the quality of training outcomes and must be addressed. However, short courses are a symptom of the broader issues that impact on quality VET outcomes. Effective solutions to these issues should emerge from an analysis of the diverse and complex factors that impact on VET quality and how they interrelate.

An inherent attribute of a competency based system is that there is no pre-set, fixed amount of training. The *Standards for RTOs* require an RTO to demonstrate that the amount of training it delivers to its learners is adequate to enable them to achieve competence, given the mode of delivery and the variable characteristics of the learner.

In terms of compliance with the *Standards for RTOs*, RTOs must be able to provide a reasoned, evidence-based and informed account of what extent of engagement is expected of a learner, taking into consideration the existing skills, knowledge and experience of the learner/learner cohort and the mode of delivery (and resources) of the RTO

In a competency-based approach to training, the competency outcome is fixed and a variable amount of training is applied to enable each learner to achieve that fixed outcome (competence), as illustrated in the table below⁵

	Amount of training	Outcome
Traditional education and training	Fixed	Variable
Competency based training	Variable	Fixed

RTOs are currently the primary decision-makers about the duration of training in the program delivery phase. In addition, decisions about the amount of training are informed by an RTO's industry engagement processes (*Standards for RTOs*, Clause 1 5, 1 6)

In the context of the requirements set out in the *Standards for RTOs*, the question needs to be asked as to whether there is a place for volume of learning to be retained in the AQF in relation to VET. It is feasible to conclude that the 'volume of learning' indicator within the AQF is out of date and adds no value or practical relevance in relation to VET.

There are a range of other factors that pose significant risks to the quality of VET outcomes, such as poor assessment practices, inexperienced and poorly trained trainers and assessors and unstructured and unsupervised work placements. Volume of learning is being given undue attention compared to other factors that impact on the quality of training. Data published by VET regulators year after year confirms that the highest levels of non-compliance are in relation to assessment. It is important to reinforce that effective

⁵ TAC Fact Sheet Amount of Training, V1-18, 4 July 2018

assessment practices are key to ensuring quality VET outcomes and the sector would benefit greatly from directing effort and resources to supporting RTOs to improve assessment practices

Redefine/rename 'typical learner'

If, through the review process, it is determined that the volume of learning is retained in the AQF, then there is an opportunity to re-define and/or re-name 'typical learner' The term 'new learner' could instead be considered and may be defined as a learner who:

- has had little exposure (experience) to or skills and knowledge in the industry sector or job role associated with the training product enrolled in;
- is enrolling in a higher level qualification than previously attained, and
- lacks experience with self-directed learning

The process of establishing and verifying a student as a new learner ideally takes place during pre-enrolment discussions (*Standards for RTOs*, Clause 5.2b), when the prospective learner's credentials (prior learning and experience) and their educational and support needs are determined by an RTO.

2 Recognition of units and skills sets in the AQF

The AQF currently refers to full qualifications at AQF Levels 1 to 10 and does not formally recognise programs that do not have the full breadth and depth of a qualification

The use of the qualification as the only means of recognising and valuing education and training undermines the valid interpretation of units of competency and industry recognised 'qualifications' comprising of a single unit of competency or group of units. Examples of these industry recognised 'qualifications' include First Aid or High Risk Work Licence (HRWL) units and the Assessor Skills Set from the Training and Education Training Package. In VET, statements of attainment are issued for these types of industry 'qualifications' in the absence of recognised certification within the AQF

There is a greater prominence of skills sets in VET offerings due to increasing acceptance and growing demand for short courses in the VET sector spurred by a need for greater flexibility in offerings for skills development.

Given the increasing popularity and acceptance of skills sets and unit of competency based 'qualifications' with the VET sector, it is essential that the AQF Review undertake further work to consider how shorter form credentials may be recognised in the AQF. This will require careful consideration across a range of issues, including but not limited to the pedagogy as it relates to the approach taken by VET experts in relation to the development of training products, the downstream impacts or practical implications for VET practitioners in the design and development of training and assessment strategies, through to the ability of VET Regulators to effectively assess compliance against the relevant *Standards for RTOs*

3 Consolidation of explanatory documents within the main AQF document

The AQF includes a series of written explanations that are intended to provide more detailed and practical information to assist users with implementation of AQF policies. This includes explanations on articulation, credit transfer, recognition of prior learning and volume of learning which have proved to be invaluable for users to gain a better understanding of AQF implementation, however are difficult to locate without prior knowledge of their existence.

The Council strongly recommends that these explanatory documents are reviewed as part of the AQF Review and are integrated into the main AQF document, noting that some

of the policy documents, e.g. pathways and issuance policy could be removed from the AQF altogether, noting the *Standards for RTOs* (Schedule 5) outlines, in detail, the specific requirements for issuing AQF qualifications and statements of attainment within the VET sector

The Council does not support the suggestion that AQF explanations could be incorporated into relevant guidelines published by VET or other regulators⁶. Definitions and guidance related to the AQF should be contained within the AQF as a complete document and centralised, for example, with the Australian Government's Department of Education and Training (DET). This approach supports the ease to which stakeholders can locate and access relevant information

If explanatory notes, definitions and the like are incorporated into guidelines published by others, then there is a risk that edits are undertaken without consultation and consequently result in a narrow focus to align with that regulator's legislation, regulatory practices and/or interpretations.

A compromise position could be that DET continues to be the 'custodian' of the AQF in its totality (including any explanatory notes and definitions), and VET Regulators agree to publish guidance material as endorsed by DET

4 ***Taxonomies and levels***

The Council supports the AQF review in undertaking further work to consider AQF taxonomies and levels. Essential to this discussion is the importance of providing clarity for each sector, and therefore any points of difference between VET and higher education qualifications in the AQF must be examined. This work requires input from experts across all education and training sectors to inform the discussion with a view to simplify descriptors and ensure clear distinctions between levels.

Conclusion

As acknowledged in the Discussion Paper, any changes to the AQF has the potential to result in wide ranging impacts⁷, including but not limited to industrial awards and legislative frameworks. Given the broad reach of the AQF, it is essential that experts from across all sectors and States, including practitioners, are engaged in further consultation, including implementation strategies

The VET sector comprises many interconnected parts and there are a number of reviews currently being undertaken by DET, with many of the reviews generating extensive and lengthy implementation plans. The AQF Review must have regard to outcomes arising from other VET reviews in order to promote cohesion and alignment where applicable

The Discussion Paper acknowledges that changes in the way we work affects the skills and knowledge needed by graduates, which impacts on the way providers deliver education and training services⁸. A balance needs to be achieved however, to ensure the longevity and currency of a revised AQF

⁶ Review of the AQF Discussion Paper, December 2018, p34

⁷ Review of the AQF Discussion Paper, December 2018, p10

⁸ Review of the AQF Discussion Paper, December 2018, p12