



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

Dr. David Foster

Respondent organisation (where relevant)

Personal

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

I believe that the AQF has been a very valuable framework that has helped with our understanding of the hierarchical nature of learning and how this can be reflected in educational qualifications granted by different institutions. However, there are a few areas where improvements can be made. These are outlined in the next text box.

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.

There are five areas where I believe reforms are required:

1. It has been demonstrated that a large proportion of Australians undertake training or

educational courses that are “non-AQF qualifications” and have a preference for “bite-sized intensive” courses (Deloitte, 2018). This has been interpreted by some as demonstrating a need to incorporate micro-credentials into the AQF framework.

This needs to be undertaken carefully and should not result in any short course that self-declares that it develops learning outcomes at a particular AQF to be recognized as doing so. Any credential (whether large or micro) must only be identified as delivering learning outcomes at a particular AQF level when it has been accredited through a recognized, regulated educational governance regime. The focus therefore needs to be on the quality of the program (in terms of being capable of actually developing learning outcomes of a certain level) rather than other criteria such as the mode of delivery as the Discussion Paper seems to imply (“including self directed and on-demand learning” p15).

If the accreditation governance system can be assured (despite the pessimistic conclusion of PhillipsKPA, 2018), then there appears to be no reason why accredited courses cannot be included in the AQF under a generic title such as “Short Course”. This will increase the scope and availability of “nested” qualifications. The Discussion Paper appears to support the current system of “nested” qualifications through the availability of exiting certain levels in a Degree and being granted a Diploma or Advanced Diploma (and vice versa, see p15). What is proposed here is to extend this to include the recognition of smaller components of a Degree, Advanced Diploma or Diploma (such as individual courses / subjects) and giving them recognition as a “Short Course in X at AQF Level Y”. This would enable anyone to undertake any particular course (a component part of a program in HE) or subject (a component part of a Course in VET) and (if they succeeded) get recognition for that achievement. It is, however, important to link the recognized AQF Level to the actual learning outcomes of the component actually completed, rather than to the level that would have been achieved had the individual completed the totality of units in the broader program from which it is drawn. To be clear, if an individual completed a first year subject as a “Short Course’ then the latter would be recognized as Level 5 not Level 7.

The Discussion Paper acknowledges the difficulty associated with providing a regulated accreditation process for short courses developed outside the VET and HE systems. Given the competitive nature of the tertiary education system it is not possible to undertake this within the framework of current providers (eg. Sydney University accrediting a Short Course in Leadership and Management developed by Anon Educational Corporation). They would be sitting in judgement of their direct competitors. The solution could, as the Discussion paper suggests, be in the development of a self-funding Australian Qualifications Authority (AQA) along the lines of the New Zealand Qualifications Authority. Individual training, educational or professional bodies who wish to have their course delivered as an accredited course at an AQF Level would have to apply for the right to do so (at their expense). The process used by the AQA would be aligned to the accreditation processes that registered VET and HE providers currently use.

2. Most of the enterprise and social skills identified by the World Economic Forum (2018) are required by graduates of courses offered by many educational institutions. As they will become increasingly important in the future many quality providers incorporate them as an essential and explicit aspect of our courses. While the AQF currently includes generic

skills in its taxonomies of learning outcomes at each level, I believe that it would be appropriate to expand these.

I work on the understanding that, while these enterprise and social skills may be partly personal attributes, they can all be reinforced, developed or improved through education and training. I also believe that with the right approach these may be assessed with a reasonable degree of accuracy. Should this position be widely accepted then it follows that they should be incorporated in the AQF Taxonomies as non-discipline specific generic skills, including different levels of ability, even in such fundamental aspects as literacy and numeracy. Information about these learning outcomes is valuable to employers and other users of the AQF. It is acknowledged that developing a universally acceptable taxonomy will be problematic, but the value of the outcome is worth the effort.

3. Some institutions are both a TAFE and a Non University Higher Education Provider (NUHEP). They therefore deliver courses at both in VET and HE, some of which are delivered at the same AQF Level. These are Levels 5 and Levels 6. This creates a number of challenges that have to be addressed on a daily basis, including dealing with different Regulators, receiving differential funding and, importantly, managing the perceptions of students and other stakeholders who see qualifications that are different but offered at the same AQF Level. When a detailed analysis is made of the content of the specifications for the Advanced Diploma and the Associate Degree, they are remarkably similar. The major differences are:

- Purpose: The Associate Degree refers to “underpinning technical and theoretical knowledge” while the Advanced Diploma refers to “specialized knowledge” and “advanced skills”;
- Knowledge: The Associate Degree refers to “broad knowledge” while the Advanced Diploma refers to “specialized and integrated”;
- Skills: The Associate Degree refers to “creative thinking” and “analytical skills” while the Advanced Diploma includes “technical, creative or conceptual skills”; and
- Application: The Associate Degree refers to applying this knowledge and skills “with some direction” while the Advanced Diploma refers to doing things as “paraprofessional practice”.

When these are directly compared most would interpret them as being different ways of saying very similar things. There is no substantial difference between the two. It is submitted that these two could be combined into a Specification for the Advanced Diploma and/or Associate Degree. This would simplify the content of Level 6 qualifications and contribute to a better understanding of the hierarchical nature of the AQF.

4. The Discussion Paper expresses concern that some qualification types may not accurately reflect their level descriptors. The primary concern here is that some Graduate Certificates and Graduate Diplomas may not reflect the same level of complexity as undergraduate Honours Courses, although all are at AQF level 8. This could be overcome by ensuring that all qualifications that are exit qualifications for a Masters Degree (Level 9),

which themselves require a high level of pre-requisites, can be deemed to be "Graduate". Those stand-alone "Graduate" Certificates and Diplomas which do not require pre-requisites equivalent to the learning outcomes of Level 7 should not be entitled to be labelled as such. They are graduate in time not graduate in AQF Level.

5. There is some argument that while the level of autonomy is used as a differentiating factor between AQF levels, the autonomy achieved by graduates of some qualifications at lower AQF levels appears to be understated. For example, graduates with trades qualifications may work at a higher level of autonomy than bachelor graduates. However, this argument misinterprets the sense in which autonomy is being used. For example, a trades person (say with a Certificate III) may work in an 'autonomous' situation in the sense that they are not directly supervised, but their opportunity to "autonomously" select from a range of solutions to a particular problem they face would be limited. There would only be limited solutions available to them as most of the options have already been developed (by themselves or others). As one moves up the AQF hierarchy the learning outcomes are designed to ensure that the graduate has a developing ability to address problems of greater complexity with increasingly undetermined solutions to a point where the highest levels as about "unknown unknowns". Even those working at the highest level may not be working "autonomously" in the supervision sense of the word. This is still not about context (which is the other aspect of Application). Rather it is about the ability of the worker / graduate to make decisions from either a predetermined list of options (directly supervised or not) or from an increasingly complex range of options. Perhaps the solution is to change the term "autonomous" to something that more reflects a difference in decision-making capability.

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.

No comment.

Other