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.

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

> Western Sydney University supports the maintenance and enhancement of a national qualifications framework. The AQF underpins the quality, consistency and recognition of the Australian education and training system to benefit education providers, students, employers and the broad community. The AQF assists in the international recognition of Australia's higher education qualifications.
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> Western Sydney University recommends the following aspects of the AQF be improved:
> - inclusion of relevant guidance for shorter form credentials
> - improved descriptors and guidance for AQF levels to provide clarity
> - greater acknowledgement of social and professional skills.

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.

> **Incorporation of shorter form credentials into the AQF**
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> Western Sydney University supports the inclusion of guidance on shorter form credentials, and provision for shorter form credentials into the AQF where they meet the criteria and where they align to existing criteria as set out in the discussion paper:
> - Be able to be quality-assured under government approved standards
> - Be able to be accredited by an authority authorised under legislation

- Be described according to the AQF descriptions of learning outcomes (knowledge, skills, the application of knowledge and skills and generic learning outcomes)
- Be able to be located in an existing AQF level
- Have clear pathways within the AQF
- Not duplicate an existing AQF qualification type
- Meet a defined industry, professional or community need.

In addition, the University would support the introduction of a size or volume of learning threshold for offerings to be considered as shorter form credentials in the AQF.

Micro-credentials are important as they deliver flexibility in access and engagement with higher education. When supported by appropriate block-chain technology they provide better evidence of achievement than the traditional transcript. They also provide a data-based mechanism for institutions including universities to engage learners effectively with lifelong learning opportunities.

The University would welcome the development of the AQF so it is better able to recognise industry studies, micro-credentials and other forms of prior learning. The discussion paper identifies a range of shorter form credentials which could potentially benefit from inclusion in the AQF:
- Short courses (vocational or higher education)
- Enabling and foundation courses
- Micro-credentials
- Professional courses
- MOOCs.

Incorporating these types of shorter form credentials into the AQF would help learners and individuals to understand these courses and how they fit with other qualifications. This would improve recognition of these shorter form credentials nationally and internationally. It would also enable education and training providers to identify the level that has been studied making it easier to transfer credit between programs and providers.

As suggested in the discussion paper, short form credentials and micro-credentials could be recognised by a new "Professional Development Award" qualification stream, similar to the Scottish Credit and Qualifications Framework[1] (SCQF). The New Zealand model, which short-form qualifications but does not list them in the Framework, would also be workable.

The University would support the recognition of aggregated or 'stackable' qualifications which are quality assured by an integrative assessment process.

AQF Taxonomies and levels

The discussion paper notes that most other countries use level descriptors, but not the descriptors of skills, knowledge, and application of knowledge and skills for each qualification type.

Since the 2013 release of the 2nd edition of the AQF, the understanding of the difference between qualifications has grown. Industry and the community, for example, readily understand that a Graduate Diploma is a more extensive 'higher' qualification than a Graduate Certificate, even though they are at the same AQF level. Dedicated AQF descriptors for each of the qualifications provide clarity for the development of these qualifications and in turn a consistency of awards offered. The detailed descriptors indicate to education providers how the course learning outcomes can be mapped.

The University supports amending the current AQF qualification descriptors, particularly

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[1] The Scottish Credit and Qualifications Framework

where adjustment will provide greater clarity and differentiation between qualification types at the same level. Although not common in other countries, removal of the detailed descriptors for each qualification type would require careful consideration of how best to assist education providers develop consistent and comparable qualifications. The University would consider removal of the detailed descriptors a retrograde step.

Western Sydney University does not recommend increasing the number of AQF levels. Rather, more information on the relationships between levels and qualifications will ensure clearer distinctions and improved understanding and application.

Treatment of enterprise and social skills

Western Sydney University considers that guidance on the treatment of qualifications relating to specific work-ready skills would assist providers, learners and industry.

The following approaches proposed in the discussion paper are supported:

- Specify that social and enterprise skills in AQF qualifications should be able to be:
    - taught in the context of the qualification's core content,
    - acquired through the process of teaching and learning.

- Expand the list of enterprise and social skills included in the AQF. Do not include these skills as a taxonomy, rather provide guidance or advice about delivering them through various qualifications.

It is important to recognise that graduate capabilities developed through higher education are intimately connected to discipline knowledge, rather than being discrete soft skills.

Volume of Learning/Credit Points

Western Sydney University supports the continuation of Volume of Learning in its current form as an already effective and consistent guide. Provision of further guidance would assist, but a change from the current measurement of years to hours, or assigning credit points to hours, is not supported.

A universal credit transfer/recognition tool is a practical and potentially beneficial initiative, but supported as a longer term rather than immediate solution. This tool would require a cross-institutional and cross-sectoral approach, with substantial, centralised resource and funding allocations for successful development and implementation.

AQF Policies

The AQF operates as a framework with an integrated suite of policies and specifications. The policies as a whole provide useful context and statements to guide providers.

Western Sydney University supports the recommendation to update the AQF Pathways Policy, particularly as it pertains to recognition of all forms of prior learning and reintroduction of guidance that takes account of the changing nature of work and learning.

The University does not recommend the removal of the AQF Qualifications Issuance Policy. While the requirements for issuing qualifications are captured in the Higher Education Standards Framework, the comprehensive AQF policy contains additional information and is a helpful resource.

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.

Incorporation of shorter form credentials into the AQF

In relation to Enabling and Foundation courses, the paper 'Incorporating shorter form credentials into the AQF' suggests that, as these introductory higher education courses prepare students for bachelor level study at AQF Level 7, they could be aligned to AQF Level 5 or Level 6.

This is not supported by the University. As a diploma (AQF level 5) is generally recognised as entry to a bachelor degree with up to 1-year credit and an advanced diploma (AQF level 6) is recognised as entry to a bachelor degree with up to 1.5-years credit (as per the AQF Pathways Policy). It would be more appropriate to assign Enabling and Foundation courses to AQF Level 4 as they are customarily recognised for entry to a bachelor degree without credit.

AQF Taxonomies and levels

The proposal to use descriptors for knowledge, skills and their application at the AQF level only, eliminating this detail at each qualification level, may not allow sufficient clarity for the development of consistent qualifications.

While the University agrees the current descriptors are unclear and there is ambiguity between qualifications across a common level, i.e. AQF level 8 Bachelor with Honours, Graduate Certificate and Graduate Diploma, the descriptors for each qualification are helpful for the development of course outcomes and graduate attributes.

Relying on AQF Level descriptors, even with expanded purpose statements, may not adequately delineate the difference in the breadth and depth of knowledge and skills between qualifications. While the goal is towards increased flexibility, this may negatively impact application, with the descriptors being open to varied interpretation across qualifications and providers. Careful consideration would be needed of how to assist higher education providers.

Treatment of enterprise and social skills

The assessment and reporting of social and enterprise skills would be helpful. Implementation would have to be achieved in ways that are fair, valid and reliable.

The proposed nomenclature of enterprise and social skills may be problematic for implementation due to differing interpretations, especially of 'enterprise'. An emphasis on *professional and technical skills*, and *interpersonal and creative skills*, would be more appropriate.

Volume of Learning/Credit points

Western Sydney University does not disagree with the discussion paper assertion that measuring volume of learning in years is problematic. However, the proposal to transition to hours is not supported by the University as it is not considered a favourable alternative. Years are a clear and universal mode of measurement, applicable across all levels and providers.

There is significant variability in qualifications requirements based on many factors, including level, provider, type and mode of learning. Employing a unit of measurement as small as hours removes the flexibility of application across levels and qualifications. It

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assumes comparability across disciplines and education providers. The transition and how best to assign hours generically would be challenging and raise questions, e.g. are the hours restricted to contact hours, engagement hours, hours of self-study, how do applicable hours translate from competency to academic.

Further, where it has been possible to represent volume of learning as a range in years to encompass the various iterations possible within the qualifications framework, it is unclear whether this is being proposed for hours and, if so, how this could be effectively realised.

To attempt to provide clarity by assigning credit points to hours would potentially cause further issues. This approach would be particularly problematic for universities, who already adopt credit point nomenclature for the 'value' of subjects across a program.

Other