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

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[1] SkillsIQ is a Skills Service Organisation (SSO) that supports 18 Industry Reference Committees (IRCs), representing approximately 90 diverse service-related industry sectors, to undertake Vocational Education and Training (VET) training product review and development. The IRCs are collectively responsible for overseeing the development and review of ten training packages serving the skills needs of almost 50 per cent of the Australian workforce.

Our IRCs represent industries including community services, health, retail & wholesale, sport, fitness, community recreation, outdoor recreation, tourism, travel, hospitality, events, restaurants, holiday parks & resorts, local government, public sector, hairdressing, beauty services, floristry, community pharmacy and funeral services.

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

Including a wider range of credentials in the AQF
The review's discussion paper argues the need to accommodate new methods of learning such as shorter-form credentials because workplace change may require more re-skilling or upskilling and people may demand faster, cheaper learning.

We understand the demand for shorter-form credentials and support the inclusion of more forms of learning in the AQF. We believe the certification of learning will support development of a more informed employer market and facilitate career pathways for individuals.

The system needs to be transparent, enabling individuals to have recognition for their learning and supporting employers to be confident about the quality and substance of the credential. However, we believe that shorter-form credentials must include appropriate protections to ensure they do not have long-term unintended impacts such as undermining individuals' opportunity to build a rewarding career and the transferability of skills, particularly given that many employees work in small businesses that account for 97 per cent of all Australia's businesses.[2]

Protections should include:
- Policy settings that reinforce the continuing importance of full qualifications and that encourage shorter-form credentials to be used primarily:
  - for upskilling/re-skilling as a top-up of existing qualifications
  - to foster a lifelong learning culture, or
  - as a clear pathway to a qualification, such as pre-apprenticeship programs that have been shown to improve apprenticeship completions.[3]
- Such credentials are required to meet a consistent set of nationally agreed standards and are quality assured.
- Their development, review and endorsement is led by industry. The AQF discussion paper notes that in New Zealand micro-credentials must have support from industry, employers or the community.

We therefore support the current provisions of the AQF in relation to the conditions that must be met by a qualification type, as set out on page 15 of the discussion paper.

A final point in relation to the inclusion of short-form credentials or not, is that recognition of the credentials is only one part of the policy picture. As we have seen with skill sets, the availability and use of such credentials is influenced by the current funding settings. Changes to policy and funding arrangements, together with certification and the appropriate protections as outlined above, may achieve greater uptake of short-form credentials.

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[2] Australian Small Business and Family Enterprise Ombudsman (2016) Small Business Counts: Small Business in the Australian Economy, Commonwealth of Australia
[3] See for example the Australian Industry Group's *Making Apprenticeships Work* report which argues that apprenticeship pathways including pre-apprenticeships are under-utilised. The report recommends that pre-apprenticeship programs be more clearly defined and supported to more effectively engage young people and strengthen the pathway to apprenticeships. Australian Industry Group (2016) *Making Apprenticeships Work*, AiGroup, Melbourne, p16

The treatment of enterprise and social skills in the AQF
Our view is that any further inclusion of social and enterprise skills in the AQF is unnecessary and will simply complicate an already complex issue about which there has been ongoing debate for many years. See question 3 regarding potential implementation issues.

We believe that in the VET system the current training package development process, if thorough, enables industry to determine the level of enterprise skills required and to the extent that these can be categorised as skills (and not personal attributes or values) they will be incorporated in the units of competency.

We support the proposal in the discussion paper to remove the AQF reference to the application of a range of generic skills being specific to a particular education sector. Our view is that they are entirely dependent on industry and job role context.

AQF taxonomies and levels
The discussion paper reports that consultations for the Review indicated that the AQF design and presentation reinforces an implied hierarchy that values higher education over VET. We agree with the contention of the discussion paper that the relative status of VET and higher education is a significant issue that requires much more intervention at a policy, funding and social level than simply redesigning the AQF.

However, the reality is that while the AQF design remains as it is, it continues to reinforce the lesser status of VET so we fully support proposals for redesign that reduce the current implied hierarchy and that facilitate the ability to move on pathways across the sectors in both directions.

We believe that the AQF is particularly valuable **within** specific industry sectors or related sectors and internationally across specific industry sectors but should not be regarded as an instrument for comparing qualifications across different industry sectors. This is because:

- Some qualifications remain at a particular AQF level, although they appear not to conform to that descriptor, because there are industrial factors at play. This will occur no matter how the taxonomy is revised.
- The context of each industry sector is different and within a particular industry sector there may be satisfaction with the levels and the progression. Industry is simply looking for an accurate determination of what graduates need to do the job.

The question should therefore not be '*Are different qualifications in different industries which are at the same level comparable/equal?*' but instead '*Why should they be?*' In our view there is no rationale for driving comparability.

Senior secondary school certificates
We support the proposal in the discussion paper to revise the senior secondary school certificate descriptor to recognise that knowledge and skills acquired in the certificate can be at a broad range of AQF levels and result in multiple pathways. We believe it is very important to emphasise to young people that there are multiple forms of learning that offer valuable pathways and opportunities.

Volume of learning

We do not support the proposals in the discussion paper with respect to volume of learning. The reasons for our response at outlined at question 3.

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.

The following outlines our views in relation to reform priorities to address the needs identified by the industry sectors supported by SkillsIQ.

Priority 1 The relative status of VET – resdesigning the AQF
The background paper for the Review *Other Countries - Shorter Form Credentials in Qualifications Frameworks* features a diagram of Ireland's Qualifications Framework which is presented as a semi-circle.

This presentation options could go part of the way to reducing the current hierarchical design of the AQF and place a greater emphasis on pathways across the sectors.

Another option is to move away from the terminology of levels 1 to 10 and adopt less hierarchical terminology such as 'range A to J'.

Priority 2 Making the AQF more accessible and user-friendly – duplication of descriptors
We note the discussion paper reports that background research for the review found that many AQF users find the AQF confusing because:
- Unlike frameworks in other countries, it has descriptors of knowledge and skills and their application for both levels and qualification types, and
- Sometimes the descriptors for levels and qualification types repeat or contradict each other.

We support any proposal that will make the AQF more accessible and user-friendly and therefore support the approach proposed in the paper to remove duplication by using AQF levels only to describe knowledge and skills and their application, and to provide a description of each qualification type that is linked to levels.

Priority 3 Ensuring the AQF remains fit for purpose in a changing environment
Although we have noted in response to question 1 that the AQF should not be regarded as an instrument for comparing qualifications across different industry sectors, we fully support the proposals in the discussion paper to:
- Review the application of knowledge and skills domain of the AQF taxonomy and how it should be applied across the AQF levels, and
- Revise descriptors to simplify them and ensure clear distinctions between levels.

This is because we believe the AQF is an important piece of Australia's education architecture and we fully support this Review to ensure it remains fit for purpose. Given the rapid changes in learning and work, we believe it should be reviewed at agreed regular intervals to ensure continued fitness for purpose.

In addition, as mentioned previously, we would like to see more value placed on pathways not only through levels but also across them. Employers and individuals need further support in identifying transferable skills. For example, a person with a Certificate III in Hospitality may have

high-level 'front-of-house' skills that are readily transferable to another industry context such as aged care which is now being driven by a consumer-directed care approach.

We suggest that consideration be given to ways in which the descriptors can better support employers and individuals to identify transferable skills.

Priority 4 Removing the volume of learning range
For the reasons outlined in the discussion paper the current volume of learning range generates confusion and complexity and is not useful. However, as outlined in relation to question 3, we do not support the proposals in the discussion paper with respect to volume of learning.
We propose instead that volume of learning range should be removed from the AQF. The current explanatory material on volume of learning should be adapted as AQF guidance to explain why volume of learning may vary and that the responsibility lies with educational bodies to demonstrate that the depth and breadth of learning outcomes for the qualification have been achieved.

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.

Shorter-form credentials
We would have concerns about any proposal to allocate shorter-form credentials, such as one unit of competency, to the AQF level of the full qualification as units are not currently allocated an AQF level for sound reasons. It is an important principle that only in combination can the units forming a full qualification reflect the learning outcomes of the relevant AQF level.

In any case we believe the current arrangements can provide individuals with sufficient certification for shorter credentials such as skill sets, short courses in VET and incomplete qualifications (for example, single or several units of competency) due to the VET system's core operating principle of national recognition.

The proposal to include some short-form credentials such as Massive Open Online Courses (MOOCs) is challenging given their wide range of content, complexity and use. In addition, the volume of MOOCs is so large that in order for them to meet the AQF requirement to 'be able to be accredited by an authority authorised under legislation' there are significant resource implications for such an authority which would need to be considered in relation to implementation impacts.

Inclusion of social and enterprise skills in the AQF
Any further inclusion of social and enterprise skills in the AQF potentially has the following impacts:
- There is no agreement on the definitive list of social and enterprise skills. The proliferation of lists and frameworks (e.g. foundation skills, Australian Core Skills Framework, employability skills, the World Economic Forum list referenced on page 19 of the Review's discussion paper) creates confusion.
- As the discussion paper notes, there is no consistent agreement that many of the skills can be taught and assessed as some are personal attributes or values rather than skills. While teaching and assessment may be able to certify knowledge and awareness, the

application of that knowledge and awareness may only become evident in a specific job role context.

- We should not give employers a false impression that the education system can address deficits in many of these attributes because it is simply not possible for the system to deliver on this expectation. Employers also have a responsibility to invest in thorough recruitment practices in which they determine and test for the attributes required in their employees.

Volume of learning in the AQF

As outlined in SkillsIQ's recent submission to the VET Review, we have seen an increasing drive by policy makers to include volume of learning in qualifications as a way primarily to address concerns about poor quality delivery and assessment of qualifications. Volume of learning is a blunt instrument that does not take full consideration of the needs of industry and the complexities of training delivery in different sectors.

Furthermore, it is our observation that volume of learning and duration of programs are commonly used interchangeably, with duration being used as a proxy measure of volume of learning. We acknowledge there are challenges to be addressed where providers driven by access to easy funding offer courses such as Certificate III in Individual Support in two to three weeks, which clearly is not adequate for learners. We outline our view about more appropriate ways to address this challenge in the final point below.

We do not support the proposals in the discussion paper for the following reasons:

- Our contention is that mandated duration or a prescriptive approach to volume of learning do not necessarily equal quality – a poorly developed, taught and assessed course of 12 months will not achieve better outcomes than a course of 6 months' duration which has been well-designed with close industry collaboration, and is delivered with high-quality teaching and assessment. Prescriptive approaches to duration or volume of learning can also drive perverse outcomes such as:

    o creating barriers to awarding Recognition of Prior Learning, forcing students to learn what they already know and requiring work placements which do not include meaningful learning opportunities.
    o creating significant disadvantages for employers who want to see the VET system achieving skilled and productive staff within realistic rather than prescribed timeframes.

- The term 'new learner' while an improvement on 'typical learner' still presents challenges. A new learner who has significant life and work experience, even if learning in a new sector, may still learn more quickly than a new learner who is commencing their study straight from school. The term also does not recognise that individuals have different learning styles and in our future world of continuous and lifelong learning in which changing disciplines will be a constant, some new learners will be very accomplished at learning.

- Shifting from the current volume of learning which is in years to hours will not address the current concerns about quality and will present even more challenges:
    o Who will allocate the hours? If industry is expected to do this, on what basis will it be able to do this in a consistent way?

- How will this resolve the continuing tension with 'nominal hours' which are used by jurisdictions to identify funding levels?
- A credit point system which reflects hours of learning faces the same challenges as volume of learning expressed in hours.
- Australia already has a national qualifications system to facilitate pathways and offer a common currency.

Having said this it should be recognised that there is widespread disquiet in some areas of industry with the quality of delivery, and this needs to be addressed. IRCs together with their SSOs can potentially play a major role in helping to address this matter. As outlined in our submission to the VET Review, our view is that the biggest impacts on the quality of delivery and assessment would be to strengthen independent assessment or external verification of assessment, including external moderation and validation of assessment judgements, and to implement strategies that empower the market to make informed choices**.**

Other

We thank the panel for the opportunity to submit to the Review and are available to provide any further information in relation to the issues identified in our submission.