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

Professor Andrew Parfitt, Provost

Respondent organisation (where relevant)

University of Technology Sydney

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

Overall the AQF is fit for purpose. It provides a comprehensive representation of the structure of Australian education qualifications and provides appropriate guidance for the development of award courses. The framework is broadly comparable to international frameworks allowing appropriate recognition and exchange.

TEQSA's use of the AQF for compliance with the Higher Education Standards Framework is appropriately flexible with core AQF requirements embedded in the standards and other aspects of the AQF used as key reference and benchmark material.

UTS is of the view that there are no significant matters that warrant change to the AQF and is concerned that any material changes may upset the balance of levels and qualifications currently in place. The framework requirements are broadly stated to allow flexibility, diversity and innovation – they allow education providers to follow their own academic direction so long as it is defensible in the context of the AQF.

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.

As noted above, UTS is of the view that no significant changes need to be made to the AQF at this time. Our comments on some of the proposals raised in the discussion paper are included below.

We are seeing the growth of a range of new short-form education programs across the Australian education sector. These do not need to be included in the AQF, at least, not at this point. The growth we are seeing covers many different types of programs and their comparability is very unclear. UTS is of the view that the innovation phase of this development should be allowed to play out without impact on the AQF. Education providers can manage the intersection of microcredentials and AQF qualification courses through recognition of prior learning. As the microcredential market matures a number of clear intersections with the AQF may emerge and at that time it would be appropriate to reconsider the inclusion of microcredentials in the AQF.

UTS is of the view that enterprise and social skills are already covered by the range of skills required by the AQF and the Higher Education Standards Framework. The broad skill categories summarised in the Higher Education Standards Framework - "generic skills and their application", "knowledge and skills required for employment and further study", and "skills in independent and critical thinking suitable for life-long learning" – are suitably broad and adaptable to evolving skill requirements for work and learning.

UTS does not support the removal of suggested duplicated level and qualification type descriptors. As a number of levels cover multiple qualifications, UTS believes it is appropriate to be able to describe the level for the purposes of international comparison and to guide any future changes in qualification types, as well as being able to have more specific qualification descriptors.

UTS urges caution on the possibility of changing the AQF taxonomy. The AQF is designed to reasonably cover the breadth of potential applications - it cannot specifically reference particular workplaces or contexts without being unduly restrictive and lengthy. There is a hierarchy of outcomes at least between some levels of the AQF and while individual roles and occupations may vary somewhat from the general position, it is not necessary to reference this in the AQF.

UTS does not see the benefit of identifying sub-parts of the SSCE with a number of levels within the AQF. We think this has the potential to be confusing and the benefit is unclear.

UTS is opposed to using credit points or hours for volume of learning guidance. In higher education the standardised unit of study is the Equivalent Full Time Study Load (EFTSL). We would suggest that advice that 'year' means one EFTSL rather than a calendar period would bring sufficient clarity to volume of learning. Credit points and hours of study are too variable across the sector and likely to lead to confusion through literal interpretation by stakeholders including students.

UTS supports the use of the Pathways Policy as guidance. As noted in the discussion paper, the Higher Education Standards Framework provides sufficient direction on

recognition of prior learning. UTS does not support the development of a shared credit transfer register without an in depth assessment given the significant investment it is likely to require. Tertiary Admissions Centres generally provide information on pathways and more is being done in this area under the Commonwealth Government's admissions transparency requirements. We believe this is sufficient to address the matters raised in the discussion paper.

UTS is of the view that the AQF Qualifications Register Policy be deleted. There are already a number of registers of qualifications for stakeholders to access this information.

The AQF Qualification Type Addition and Removal Policy should be retained for the future integrity of the AQF.

The AQF Qualifications Issuance Policy should be removed given the duplication with the Higher Education Standards Framework and RTO Standards.

UTS supports the retention within the AQF of the Principles and Processes for the Alignment of the AQF with International Qualifications Frameworks. International comparison and recognition are integral to the purpose of the AQF and guidance on those matters should be retained in the document.

AQF explanations should be retained in the document to assist interpretation and should be placed to optimise their relevance.

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.

UTS is of the view that any changes to the AQF should be minimal and generally only to remove duplication with other instruments. Accordingly, we do not believe there would be any major implementation issues including regulatory impact.