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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Respondent organisation (where relevant)

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

Overall, the Australian Qualifications Framework provides an effective taxonomy of Australian qualifications. The operational components of the AQF can be broken down into 1) matters related to qualification levels, that is, the hierarchical *taxonomy* of educational achievement appropriate to each level, and 2) matters related to qualification types, that is, the *typology* of qualifications, their volume of learning and associated skills mapped against the taxonomic levels.

Our contribution here centres primarily on the second part, for we do not see a pressing need to radically restructure the existing levels. The key areas for reform, in La Trobe's view, lie in more clearly articulating both existing and emerging forms of qualification that are not presently well described within the qualifications typology. In particular, these are: the Senior School certificate, Enabling qualifications, microcredentials, and Level 5 and 6 qualifications.

We note some tensions lying at the heart of the conceptual and operational basis for an AQF, and necessarily present in both the Review Paper and our response:

- The AQF covers both higher education (HE) and vocational education and training (VET). The two sectors have developed in very different ways and serve somewhat different purposes, and therefore often have different pedagogical and curriculum structures. They are regulated by separate bodies and have different funding sources and fee arrangements. There is widespread consensus that both should be valued equally, but also that an important part of their value lies in their differences. HE is characterised by holistic approaches to learning and the development of theoretical understanding as a basis for practice, while VET is characterised by close alignments to and synergies with professional and applied practice in workplaces that are in part atomised as competencies. *The AQF must describe and accommodate both HE and VET without blurring important distinctions*.

- The AQF describes Levels and Qualifications and is in turn used by TEQSA and ASQA to prescribe standards for Qualifications within Levels. If the AQF is to support an adaptive and differentiated tertiary education landscape, education providers should be enabled to drive the formation of new educational offerings, with the AQF serving as a descriptive tool to support an understanding of the relationships between different levels and kinds of qualification. On the other hand, the quality of Australian tertiary education needs to be protected. The AQF is an important regulatory tool, and the framework can highlight where qualifications do not meet acceptable standards. However, to the extent that the AQF is used to standardise and enforce compliance, it may inhibit innovation. *The AQF needs to be descriptive and responsive, but still protect quality*.

- In all cases, there are a series of specific challenges of inclusion, exclusion and differentiation to consider. Some of these are currently in existence (for example, gaps in coverage around the bridging between secondary and tertiary education); others are emerging (for example, new ways of conceptualising life-long learning and the accumulation of learning for credentialling).

A test of the success of any redesign of the AQF will be the extent to which it can navigate these challenges in order to meet its first objective, to "accommodate the diversity of purposes of Australian education and training now and into the future."

1. Areas for improvement in the AQF

1.1 Senior Secondary Certificate

The SSC as presented in the AQF does not presently describe pathways to further learning in an adequate way, and better integration between the school and tertiary—especially university—sectors is needed. The AQF requires that each qualification level (bar the doctorate) provides the knowledge and skills required for progression to the next level qualification (or a work outcome). The SSC outcomes descriptor is vague, indicating holders might progress to 'diverse pathways to further learning'. As discussed in the Review paper, the SSC may be indicative of achievement across a variety of AQF levels, and some senior secondary students also study VET certificates.

At present each State and Territory awards a variety of certificates within the SSC framework. Some lead to an ATAR but others do not. To give some examples of this complexity: in Victoria the VCE leads to an ATAR but the VCAL does not, while in NSW the HSC leads to an ATAR if a student chooses a HSC (Board Developed Course) but not if they choose a HSC (Board Endorsed Course). In Western Australia, the WACE can be taken as any of five courses: ATAR, General, Foundation, VET industry specific, and Preliminary.

The failure of the SSC qualification descriptor to articulate clear pathways to work, further vocational education, or higher education adds to confusion about the role of various pathways

that students may take to further and higher education, and an under-appreciation of the gravity of the choice between ATAR-track senior school courses and vocational (non-ATAR-track) courses in middle high school.

The Review Paper appears to conclude that the heterogeneity of skill development possible within SSCs means that a clear AQF level outcome is not possible for the SSC. While the task may indeed be difficult, more work is needed to provide a coherent national framework for SSCs, or indeed a suite of national SSCs, that clearly signal the preparedness of students to continue to appropriate education or employment pathways.

1.2 Enabling courses

Presently, pre-entry enabling courses that prepare people for entry to bachelor and sub-bachelor courses are not included in the AQF. These courses are typically aligned with foundation courses and reflective of CERT IV level outcomes or higher. They are also crucial to achieving the equity objectives of the AQF to "support the development and maintenance of pathways which provide access to qualifications…" and "support individuals' lifelong learning goals by providing the basis for individuals to progress through education and training..." These objectives in turn fall under the first object of the Higher Education Support Act (2003), that Australia's higher education system be "characterised by quality, diversity and equity of access" (HESA 2003).

Courses at the enabling level, for example La Trobe's Tertiary Preparation Program, provide the most effective means of addressing the needs of educationally disadvantaged and/or underprepared students entering higher education. Yet courses at this level are not regulated under the AQF or subject to collections through QILT. To realise the objectives of the AQF and HESA, and to ensure course quality and consistency of outcomes for these students, these courses should be included in the AQF.

1.3 Micro-credentials

The presence of microcredentials is likely increase in our tertiary education system as students, graduates and providers seek to adapt to rapid changes in professional environments, making this review a timely opportunity to provide a nationally recognised and trusted mechanism for managing this transition to sustain the integrity of institutions and credentials.

Although there will always be some – perhaps many – informal credentials that cannot or should not be regulated, users of the AQF will benefit from a consideration of the role some micro-credentials play in demonstrating evidence of achievement within, or supplementary to, existing graduate qualifications. Examples include:

- Components within a course, or of a subject within a course, such as a Cisco certificate that is embedded as a subject of an IT degree;
- Additional 'top-up' learning to maintain relevance and professional development for graduates;
- Assessed and credentialed experiences that are assessed as RPL for a given qualification.

We welcome a consideration of how such parcels of learning might be incorporated in the AQF.

1.4 Lack of clarity in qualification differences at VET/HE 'crossover' levels

There is some confusion, stemming in part form the different pedagogic approaches and purposes of HE and VET, at AQF Level 5 (VET diploma / HE diploma) and Level 6 (advanced diploma /associate degree), as well as at Level 8. VET and HE have evolved under different conditions, and to serve different needs. These differences are presently not recognised in the AQF, with distinctions between the two having been removed after the previous review (the earlier AQF described qualifications in each sector separately, while the present AQF does not distinguish between courses offered in equivalent qualifications in each sector).

These difficulties are captured by the contextual research for the present review conducted by PhillipsKPA:

- At the Advanced Diploma (VET) and Associate Degree (higher education) levels providers identified major gaps in terms of knowledge, skill, and application of knowledge and skill between the two qualification types. This is particularly problematic when designing RPL tools that enable permeability between the two sectors (p. 79).

- The distinction between diplomas (AQF 5) that are offered by VET and higher education providers is problematic. The nomenclature of 'diploma' is confusing given that VET diplomas tend to be a higher-level area specific qualification, whereas diplomas offered through higher education providers tend to be broader generic qualifications with a focus of enabling and foundational content for university study (p. 80).

The differences are confusing for students and can pose RPL difficulties for providers, and need to be either resolved (which would be difficult) or more clearly articulated within the qualifications typology.

We address possible responses to the issues described above in the following section, and comment briefly on other matters raised in the Review Paper in the final section.

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.

2.1 Senior Secondary Certificate

We suggest that schools, states, employers and tertiary education providers need to be part of a solution to the current lack of clarity and consistency in the way the SSC is treated in the AQF, and as a school exit qualification more generally.

We recommend a national review of senior school certification, perhaps directed by COAG, aimed at developing a nationally consistent senior school outcome – or suite of outcomes – that align with the AQF and more clearly specify pathways to further learning, work and effective participation in civic life. The different qualification outcomes that are described separately by each state and territory TAC and curriculum authority should be streamlined into a set of national awards that can be included in the AQF qualification descriptors to provide clarity for students, employers and institutions to better support progression from school to learning and work, as well as interstate mobility.

2.2 Enabling courses

We recommend that TEQSA develop an approach that would recognise enabling courses, whose purpose is to provide a pathway into higher education, appropriately within the AQF.

This might be a qualification at Level 5, with a qualification descriptor indicating students develop skills suitable for entry into degree and sub-degree courses.

2.3 Micro-credentials

We recommend that TEQSA develop a framework that could accommodate selected microcredentials. This will require a nuanced approach to specifying the key kinds of microcredential that are emerging to enable development of suitable governance arrangements and processes.

We urge the regulator(s) to be cognisant that microcredentials share some characteristics with VET training modules – individually they provide learning opportunities and evidence of achievement but level of learning and collective worth are variable, depending upon how these are designed and combined. It is that variability that is both their strength and risk. A challenge, therefore, to accommodating microcredentials within the AQF is to indicate how short form or portfolio-based learning experiences can be assessed and incorporated into larger qualifications in ways that indicate their contribution to the breadth and/or depth of that qualification.

We note in particular the suggestion in the Review Paper that, "One of the advantages of shorter form credentials, including micro-credentials, is that they can be grouped, aggregated or 'stacked', so learners have flexibility in sourcing learning, and can build their credentials into a larger, and more recognisable, aggregated award." We urge caution here. For example, it is difficult to envisage how a large number of micro experiences could be combined to indicate a level of achievement commensurate with a sustained program of deeper study. However, at qualification level, there is no evidence to suggest that, for example, a number of components of a subject may not be dissaggregated and/or collected to warrant advanced standing for that subject, and thus toward a course. To foreclose on this possibility by attempting to categorise each individual experience at an AQF level seems not only difficult, but also likely to result in a lack of recognition of the possibilities for the accumulation of knowledge and skill over time.

2.4 VET/HE distinctions at 'crossover levels'

The AQF Level taxonomy provides the necessary architecture to map qualifications against levels, and to enable institutions from each sector to negotiate credit arrangements taking into consideration differences in pedagogy and volume of learning. This is complicated at Levels 5 and 6 (and to some extent, 8) in the qualification typology, however, by differences in curricula and pedagogy in VET and HE that make awards with the same title compositionally different in some cases different.

In the context of distinctions between course types at Levels 5, 6 and 8 and in terms of the AQF itself, the issues here might be addressed by clearer articulation in the qualification typology rather than attempted resolution in the level taxonomy. A simple answer would be to differentiate the titles of VET and HE awards, and the application of knowledge and skills, at levels where they intersect to make clear that while there is an equivalence in broad level of course, purposes and outcomes are different. This may also make variations in RPL clearer for students. Additionally, the AQF might recognise and value the differentiation between HE and VET in the preamble and framing of the AQF.

We suggest clarifying rather than obscuring the different practices and purposes of VET and HE qualifications.

There are a number of further suggestions raised in the discussion paper that we consider below in the section 'Other.'

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.

Changes and additions to the AQF should be driven by the requirement for a clear description of Australian qualifications that benefits students and institutions by showing how Levels and Qualifications relate to each other.

Once any changes have been nominated by the Review panel, further consultation about how these might be implemented is welcome.

Other

Other issues raised in the discussion paper
Areas for change and associated questions about approaching any changes raised in the discussion paper not addressed above:

The treatment of enterprise and social skills could be clarified in the AQF
The suggestion to expand the list of enterprise and social skills in order to provide guidance and advice about delivering them through various qualifications is acceptable, but thse should not be included as skills in the taxonomy. These kinds of skills are developed differently and applied in different ways according to discipline and are not amenable to broad-level qualification descriptions, or to assessment and reporting.

Issues in the Paper related to Taxonomies and Levels
The Paper suggests the following:

• *Use AQF levels only to describe knowledge and skills and their application, and provide a description of each qualification type that is linked to levels.*

Agreed. Further consultation should be undertaken after such a redrafting.

• *Review the application of knowledge and skills domain of the AQF taxonomy and how it should be applied across the AQF levels.*

Agreed. We note, however, that that the learning outcomes descriptors across disciplines are well accepted and established, and it is important that a revision does not result in greater constraints Further consultation should be undertaken after such a review.

• *Revise descriptors to simplify them and ensure clear distinctions between levels*.

This may also include review to describe differences in approach and purpose between VET and HE qualification descriptors in line with our earlier recommendation. Further consultation should be undertaken after such a review.

Volume of Learning

• *The Paper suggests changing the volume of learning unit of measurement from years to hours.*

It is not clear whether the hours referred to would be for contact, contact and indicative learning hours, or a variation on these concepts. In each case, a change in volume of learning from years to hours would have a significant impact on the administration of courses in higher education, for no discernable value. At the doctoral level, for example, it would be almost impossible to implement, and even in the bachelor there are substantial differences between disciplines in terms of the configuration of learning – including vast differences between contact hours driven by, for example, clinical hours vs project work. The present volume of learning at years is indicative and appropriate in a HE context.

The concerns regarding interpretation could be simply clarified by a statement that volume is based on a standard full time load and can be translated in cases of intensive or self-paced learning programs, reduced breaks or additional teaching periods. *We do not support the proposed change.*

- *The Paper suggests basing volume of learning on the needs for a new learner.*

The characterisation of a 'new learner' is problematic in relation to volume. Linking volume explicitly to the notion of a new learner would likely drive a need to define what this is and lead to confusion about credit, including how students may transition between related areas through the AQF levels. Both VE and HE currently navigate this space very successfully through the assessment of prior learning for entry and credit. *We do not support change.*

- *The Paper suggests introducing an [hours based] credit point system.*

While we do not support hours as the universal 'currency' of a credits point system, we support the broad idea of a system of consistent credit numbering. This would assist in calculation of prior learning volume by providing comparitive EFSTL information. However, we also support such a system being *voluntarily* used by providers.

AQF policies
The Paper suggests the following:

- *Revise the Pathways Policy as guidance, noting that primary responsibility for providing pathways sits with providers, training package developers and regulators.*

Agreed.

- *Develop a shared credit transfer register*

A shared credit transfer register can be a useful means for institutions to present their credit arrangements in one place. It should not, however, be understood as a set of rules for individual courses. We support this suggestion, noting that such a register will necessarily be limited to a subset of the credit activities.

- *Remove the AQF Qualifications Register Policy from the AQF*

Agreed.

- *Retain the AQF Qualification Type Addition and Removal Policy in the AQF*

Agreed.

- *Consider whether the AQF Qualifications Issuance Policy should be retained in the AQF*

Agreed. Further consultation should be undertaken after such consideration.

- *Remove from the AQF the Principles and Processes for the Alignment of the AQF with International Qualifications Frameworks and retain them as a Department of Education and Training Policy*

Further information is needed about the status of Department of Education and Training Policies, and the extent to which such a policy would confer obligations on providers.