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 Darrell Evans (Deputy Vice-Chancellor (Academic)

Respondent organisation (where relevant)

University of Newcastle (The University)

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

The University of Newcastle wishes to clearly convey that the AQF is fit for purpose and provides an important regulatory and national framework for Higher Education.

The University has considered the consultation paper presented by the working group and staff have attended the consultation events organised by the panel.

While being clear that the AQF is fit for purpose, there is scope for modifications, enhancements and clarifications. The panel has provided a good capture of the issues. Our detailed comments are provided in the sections below.

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 detail is provided and structured around the main topics included in the report:

A wider range of credentials could be included in the AQF
The AQF is used by a wide range of agencies, not all of which are familiar with its application. For example, some accrediting bodies use the AQF during accreditation processes. Being mindful of the range of audiences that use the AQF, it is crucial that its structure and language is clear and unambiguous. The University of Newcastle's main concern is that adding more qualification types and detail to the framework will increase its complexity, and lead to further confusion with potential for unhelpful outcomes.

Specifically, we note impacts of including the following:

- **VET** – many VET programs already align to AQF, others are more skill-based and thus less well aligned to the current framework. While university and skill-based VET courses develop very different skill sets, both are valuable in their own right and it is important that neither are confused or devalued.

  Therefore, the AQF needs to clearly articulate respective qualification types and levels to ensure the respective values and differences between the qualification types are not confused. Some of the confusion with VET courses results from the level and program-based criteria within the framework. This is also an issue where multiple qualifications are embedded within another qualification.

- **Short courses and MOOCs** – short courses are often delivered by higher educational institutions for a variety of reasons ranging from social education programs, to professional development, for credit towards part of a typical university unit of study and for the communication of research outcomes. These offerings range from a couple of hours in duration to the equivalent of a typical higher education unit of study with the nature and or absence of assessment often being a major differentiator.

  The sheer range and diversity of short-course offerings makes it impractical to include them within the AQF and it is important to ensure such offerings have appropriate flexibility of use. The University maintains it is possible to align (some select) courses to the AQF using the same principles that would traditionally be used for course design. The University has recently developed a framework where short courses can be mapped to AQF levels, but in this case at a lower credit value than traditional courses in our standard degree programs.

  By careful construction of 'micro-unit' design and composition of multiple micro-units into cohesive units of 'micro-study', the core principles of the current AQF are maintained. Short courses in the AQF do not need special accommodation since alignment as proposed above simply indicates a student has gained a defined level of skills and learning outcomes, just in smaller units (credit value) of study.

- **Incomplete qualifications** – many students leave a program without being able to complete it fully. If for whatever reason a student is able to enter another institution to complete their qualification by transferring units of study this provides an ideal way to remove unnecessary attrition from the sector. While transcripts provide a way to assess

partial qualification, often an alignment to the learning outcomes of the new program are still required. This is a time consuming process, but the inclusion of such detail on the transcript is likely to increase the complexity to the point that its usability is limited. Thus the University of Newcastle agrees the optimal approach is to embed 'next' exit qualifications into programs of study.

- **Enabling** – There has been some discussion in the Sector regarding the addition of enabling education into the AQF. The University has significant experience of successful enabling education and offers well established programs that have provided a pathway for thousands of students. While it is understood students welcome opportunities to gain qualifications immediately upon entering higher education, requiring enabling education to meet the specific needs of a qualification framework does not best match the needs of students at this level. The University of Newcastle considers enabling education as a pathway to enable students to gain the skills and confidence to allow them to succeed in higher education and thus equates it more closely to the school-based qualifciations. Thus, consistent with other feedback we provide for high school qualification, we do not recommend its inclusion in the AQF.

  Enabling education currently has the flexibility to match educational needs to those the students; this capacity should remain. Enabling education is best achieved when it can be a personalised experience that is closely matched to the needs of the student and the requirement of their specific degree program. The University of Newcastle is concerned that alignment to the AQF to level 5 or 6 will remove this flexibility and thereby reduce the value of what currently is an excellent preparation for students who need extra help to access degree level study.

The treatment of enterprise and social skills could be clarified in the AQF
Many enterprise and social skills are valuable assets to employers and the community. Nevertheless, the challenge of incorporating and assessing both enterprise and social skills within every curriculum and the difference in preparedness and final 'competencies' of different cohorts should not be underestimated. The University also has concerns that many of these skills are more easily attained in home and community circumstances with more social capital. This will further challenge students entering from widening participation schemes and broaden their gap in attainment.

This is not to say that we do not wish to see the treatment of the current generic skills reconsidered. We note these are often highlighted by students and employers as closely matching those skills embedded in a high school qualification, this often results in students disengaging as they do not see these are graduate qualities. Thus, the University of Newcastle is comfortable with a proposal that there will be updates to the skills proposed within the framework. We ask that the attributes eventually identified be narrowed to a limited number and careful consideration be given to the feasibility for accurate assessment and the ability to define an expected competency level that is applicable to all disciplines.

While not intending to specifically identify one attribute over others, we note there has been considerable discussion in the sector around academic integrity. This has included suggestions that all graduates sign off that they understand and will respect acadmic integrity. Including this attribute in the AQF may facilitate a more comprehensive learning experience for students.

AQF taxonomies and levels

The AQF is designed around outcomes of graduates and we agree this is a good design construct. However, nesting qualifications within each other can cause problems. For instance, the undergraduate diploma and associate degree may be embedded within the Level 7 degree qualification. Thus, a Level 7 qualification may incorporate a Level 5 qualification and/or a Level 6 qualification.

Embedded qualifications offer students greater flexibility, including the ability to exit early and still gain a recognised qualification. They also allow students to move more easily move between institutions or to return after a break in study. However, they can increase the formal structure of a program (such as the taught sequence of units of study), reducing institutional and individual flexibility. The University recognises that a balance between the two must be established.

At the postgraduate level, we agree with 'the concern by some stakeholders that Graduate Certificates and Graduate Diplomas at Level 8 are not of the same complexity as the Bachelor Honours year, which is also at Level 8', and recommend a review of the way Honours is represented in the AQF, but with a caution against introducing an excessive number of levels.

The University of Newcastle does not support moving the knowledge and skill descriptor to the 'Level' category. We agree that the way knowledge and skills, and their application at both level and program descriptions, are presented can be problematic and therefore suggest they should be removed from the Level category. Level 8 illustrates this issue: it incorporates a graduate certificate, graduate diploma and (due to 'nesting' of qualifications) links to three styles of master's program. In the case of the graduate certificate and the graduate diploma both have the same skill sets, while each of the three master's degrees have different skills.

As an alternative, we recommend each level describe high-level attributes of the graduate, and that the distinct skill sets be retained within the qualification. Some updates will also be necessary to describe the differences between qualifications, for instance, between the graduate certificate and graduate diploma. Without this, the only main differentiator would be the volume of learning.

Senior secondary school certificates

The current version of the AQF includes a description of the Higher School Certificate. This supports comparability between the year 12 qualification and certificate-based VET programs. However, the AQF's core value is in providing a framework that describes post-secondary education qualifications.

We note that some schools support VET Certificates I, II or III programs. These are highly skill-based and express a progression within and across their programs. The skills they develop are different to those typically included within higher education degree programs, but this is not to suggest that either has more value than the other. We maintain that progressing from a skill-based certificate program to a more traditional degree program may be possible (and desirable) in some circumstances, but the basis upon which it is possible needs to be expressed in the institution's admission requirements for that degree, rather than in the AQF.

Volume of Learning

There are two aspects to volume of learning. Firstly, there is the full-time or equivalent duration of the program and secondly there is the EFTSL hours of educational participation.

The University of Newcastle uses the volume metric EFTSL hours as a guide within its program design. The measurement of 'years full-time' is a typical measure within higher education for defining student study (EFTSL) and staff contract hours (FTE). This can then be easily rationalised to define part-time study requirements without limiting the flexibility of that study.

Nevertheless, we agree there is confusion regarding program duration, as many programs types have a range of study periods. We understand this range takes into consideration the fact that learners may start with different backgrounds or knowledge-sets – typically expressed as cognate and non-cognate entry routes. We are also conscious that learning is not simply about hours of learning and accordingly we must be careful to accommodate differences in learning styles and needs. These issues therefore need to be resolved as part of the credit framework.

AQF Policies
The University of Newcastle supports the proposal to revise the Pathways Policy as a guidance note.

Principles and Processes for the Alignment of the AQF with International Qualifications Frameworks

International qualifications are intrinsically linked with institutional admission strategies, including articulation arrangements and the approval of RPL. From a practical standpoint, it is very helpful when negotiating international agreements to have a standardised way of assessing equivalence in levels and, in particular, credits. We note there are existing schemas that already do this, such as that provided by the British Council (NARIC).

These frameworks allow institutions to compare and match specific Australian qualifications with completed international qualifications. However, not all institutions consider a country's qualification type as equal and often consider in addition the type and standing of the institution or the GPA equivalent of the individual applicant. It is important to retain this opportunity to allow institutions to align international admission with their domestic admission strategy.

Further, partial qualifications, or qualifications that are embedded within a program of study leading to consideration of RPL or advanced admission, require stronger alignment to the learning outcomes so all students have the appropriate background to succeed within a program.

Therefore, although the University recognises the importance of this work, we note the existence of knowledge bases that already enable required comparisons. Consequently, the University proposes that any alignment beyond international agreements such as the Bologna framework should be out of the scope of TEQSA's remit.

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.

Implementation will need to involve consultation with a range of stakeholders including regulatory and professional accreditation bodies. A transition plan will also need to be developed noting this will impact on admission and enrolment information for students, and strategies for institutions.

Other

> The University of Newcastle thanks the Expert Panel for the opportunity to comment on the Australian Qualifications Framework discussion paper.
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> This response has been compiled through comprehensive consultation across the University.