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Office of the Provost

14 March 2019

The Hon Dan Tehan MP
Minister for Education
Department of Education and Training
GPO Box 9880
Canberra ACT 2601

Email: AQFReview@education.gov.au

Dear Minister Tehan

Re: QUT's Submission in Response to Review of the Australian Qualifications Framework

QUT welcomes the opportunity to comment on the Discussion Paper on the Review of the Australian Qualifications Framework. Please find enclosed QUT's submission in response to the terms of reference for the review and the issues and opportunities presented in the paper.

Yours Sincerely

Professor Carol Dickenson AM
Provost

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 Carol Dickenson, Provost

Respondent organisation (where relevant)

QUT

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

QUT is pleased to respond to the AQF Discussion Paper released for comment late last year.

With the understanding that the AQF is intended to provide a framework for our higher education, vocational and senior secondary schools, it has done so and served that purpose to some degree. As the AQF discussion paper recognises, the nature of work and learning is changing and the current AQF does not currently provide:

- For innovative models of education, such as the vertical double degree.

- For some of the nuances that exist within the levels, in particular within postgraduate and honours degrees.

- An approach to the emerging field of micro or short credentials which are resulting from this changing expectation and demand.

- A consistent, quality assured way to apply RPL or credit.

In addition, the AQF may serve to cement a divide between vocational and higher education in this country. As a framework that aims to develop and ensure pathways, this is problematic.

The AQF is heavily reliant upon notional Volume of Learning and with the variety of ways in which institutions now deliver courses and the increasing departure from the traditional two semester

academic year, this is becoming challenging. The suggestion to move to a credit point system in place of a calendar system would be welcome and would align more with international practice. In what is supposed to be an outcomes based system of higher education, having the Volume of Learning as 'an integral part of the descriptor for each qualification type' can also be problematic.

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.

This section will address the areas for possible change, with reference to the possible approaches suggested in the Discussion Paper.

4.1 A wider range of credentials could be included in the AQF

QUT has a preference for a more flexible approach to shorter form credentials rather than including them in the AQF. The robust QA mechanisms in self-accrediting institutions already provide assurance of the quality of shorter form offerings, and alignment to AQF levels where appropriate as stackable qualifications. QUT is currently in the process of building a fit for purpose curriculum management system which will support the assurance and management of learning that takes place outside the formal framework of a course.

There is perhaps more opportunity to rapidly respond to emerging demands of future learning and future students, through a more formalised, or standardised, sector-wide approach to RPL, where all learning outside the AQF may be considered.

4.2 The treatment of enterprise and social skills could be clarified in the AQF

It is acknowledged that with the changing nature of work there is more demand for enterprise and social skills. The example provided in the Discussion Paper from the World Economic Forum is of interest, however there appears to be no definition for the terms and therefore it is not clear what the terms are referring to and they could be interpreted in a variety of ways. FYA's *New Basics: Big data reveals what young people need for the New Work Order* (2017) highlights the enterprise skills valued by employers and the paper also highlights which enterprise skills are preferred in different careers. QUT would support the inclusion of high level, broad descriptors of social and enterprise type skills within the AQF, as long as they were able to be contextualised to the qualification.

We strongly support the inclusion of digital literacy and a continued focus on enterprise skills, however note that there may be some concern whether some of the skills, such as empathy, could be taught, or acquired or assessed in a valid way and it would be beneficial for the AQF to provide advice or guidance about their delivery if this was expressly included.

4.3 AQF taxonomies and levels

Remove duplication of descriptors

QUT supports the approach to 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 (i.e. remove duplication).

Revise the AQF taxonomy, particularly in application of knowledge and skills.

QUT supports the revision of the AQF taxonomy, particularly in application of knowledge and skills. In doing so, there should be some consideration of whether all descriptors need to be differentiated between all levels, or whether to include only learning outcomes that can be differentiated across levels in order to clarify and simplify the descriptors and provide clarity

around the difference between them. Major changes in this space, however, may require considerable rework by some disciplines to separate the highly scaffolded (nested) courses.

There may also be room within this revision to consider the ACOLA report (2016) recommendations with respect to the role of industry in our research higher degrees, and how this is reflected in the AQF.

Recognising the value of VET and higher education

Recognition of the value of VET may not be possible through the AQF framework, as a wide array of other policy influences impact on this. However, ensuring clear descriptors may improve the pathways that could exist between TAFE and tertiary institutions, while building further support to ensure the transfer of credit between the sectors would also improve pathways and recognition of value.

Some qualifications types may not conform to their AQF level descriptors

QUT supports the revision of descriptors to simplify them and ensure clear distinctions between levels.

There are issues around dual sector qualification types

QUT agrees that the difficulties exist due to the lack of differences between AQF Level 8 courses in the higher education sector diploma and Vocational Education and Training (VET) sector; and similarly that there is some difficulty with the provision of credit between the sectors, such as between Level 5 and 6 and higher education awards. Greater clarity would be useful, however we also recognise that there is a balance to ensure flexibility and pathways across the whole tertiary system.

4.5 Volume of Learning

QUT recognises that there is a need for guidelines to support understanding of the typical times to completion for qualifications, and to support their transferability. We support the move to hours based credit point system as a description of volume of learning.

The possible approach of reframing of volume learning to describe what is typically needed for a new learner is welcomed, however this also highlights an ongoing issue surrounding courses sitting in AQF level 8 and 9, such as honours and postgraduate courses such as the Graduate Certificate, Graduate Diploma and Masters, which may provide new disciplinary grounding for students, or an extension of disciplinary knowledge.

Currently this difference is reflected somewhat in the volume of learning typically required for the masters, yet we would argue that the depth of knowledge that is required would support either an alternative qualification type, or a way to differentiate *within* the level more clearly to better reflect the different type of study these different awards actually represent and the different outcomes they achieve. The current AQF levels suggest a graduate certificate for a new learner (Level 8) as the same level as an honours bachelor degree in a discipline (Level 8) although it is hard to understand how they can be considered parallel, when one is developing in a new discipline and one is deepening knowledge. Creating a distinction between these courses, perhaps positioned at 7 and 8, will inform both students and future employers more clearly about learning outcomes.

This issue is also reflected within the master degrees where there is inconsistency of duration, and application of disciplinary cognacy for entry, across the sector. Master degrees vary from 12 months to beyond two years full time, depending on the discipline and institution and entry requirements. This creates confusion in the market our graduates will enter, as the different master degree structures are not fully understood, even by some within the sector. The academic rigor, workload and application required can differ considerably depending on whether the course is coursework, research or mixed. Many universities offer master degrees as initial qualifications which raises the question of whether these are genuinely postgraduate in AQF level, and if they

are, whether there is a more transparent way to describe them.

This issue feeds in directly to the development of vertical double degrees, which 'cross-credit' units into both the under and post-graduate component degrees and are challenging to describe with the current AQF volume of learning definition. Either way, these innovative models require clarification in the AQF.

5.1 AQF Policies

QUT supports the possible approaches outlined in the discussion paper, however notes that it is hard to know how a shared credit transfer register would be maintained, considering the volume of activity in that space.

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.

4.1 A wider range of credentials could be included in the AQF:

Major implementation issues concerned with the inclusion of shorter credentials could result in significant local revision and possible realignment of existing micro-credentials and other short courses. New processes would be needed to manage these credentials and this would increase the load of accreditation and review governance within institutions, which may slow down their development, although may increase mobility and recognition of the qualifications in the sector, and the community more broadly.

There is a need to recognise that not all short courses will be used to build towards a credentialed course or entry to higher learning but rather to evidence skills development for employability. As such there needs to remain flexibility and space within the institution to continue to develop these items that may be used as non assessable 'modules' and remain outside the AQF.

4.5 Volume of Learning

If an hours based credit point system is developed, it may have implications on a local level for descriptions and approaches to awards. This should, however, ultimately lead to greater transparency and pathways between levels and institutions.

5.1 AQF Policies

As noted above, implementation issues would surround the development of a shared credit transfer register, including, but not limited to, the initial development and the maintenance of such a register.

Other

Although it is beyond the scope of this Discussion Paper, a future review could investigate incorporating the framework into the Higher Education Standards to provide a single source framework.