

Response to the consultation paper on the 'Review of the Australian Qualifications Framework' Discussion Paper

The AQF Broad Questions

A National Qualifications Framework sets out the ways in which the lifelong learning of Australians is facilitated and recognized, smoothing over the sectoral boundaries within its education system. Since its establishment the AQF has facilitated the completion of VET qualifications in Senior Secondary Schools, the offering of higher education qualifications by TAFEs and the offering of VET qualifications by Universities. Unfortunately, the effect of the national qualification's framework is undermined by the Higher Education and VET standards and regulatory bodies of TEQSA and ASQA, with providers operating across the framework requiring registration both as a higher education provider and a training organization. As a minimum alignment between the AQF, the relevant standards and the regulatory agencies should be improved to provide a context for the breadth required and the value of each level of tertiary education at different stages of Australians' lives and ensure education providers can flexibly develop education programs relevant to the future, in response to employers, industry and the professions. The current risk is that the Australian Qualifications Framework (AQF) is perceived as a restrictive framework that does not encourage adaptability and development. The taxonomic approach drives regulation of credit transfer and recognition of prior learning, creates debate between the HE and VET sectors which dampens an effective sense of where additional tertiary education adds or develops new knowledge and skills.

- Griffith University therefore supports a revised AQF that maintains a balance between prescription and flexibility which enables timely response to employers, such as industry and professions.

Particular Issues

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

Given the purpose of National Qualification Frameworks it is important to include shorter

form credentials in the AQF. There is a range of Australian and International practical and theoretical qualifications in music, drama and dance for which state-based agencies assign AQF equivalency and are formally included in Ofqual (UK) and the European Qualifications Framework (EQF). The assignment of shorter form credentials such as graded Music qualifications to an AQF level would make their relationship to existing Australian qualifications transparent. In doing so, it is anticipated that this would increase confidence among higher education providers to grant credit towards qualifications at other AQF levels, or for admission.

Micro-credentials are diverse in nature evidencing and verifying achievement of learning outcomes, standards, knowledge, skills or capabilities, particularly with relevance to industries or employment outcomes. Micro-credentials are currently functioning in the labour market as complementary to formal award qualifications – providing just in time learning, demonstrating skill development, qualifying individuals for promotions; and facilitating career change. Micro-credentials as a facilitator of lifelong learning is a good fit for inclusion in a national qualification's framework. However, there are several barriers to assigning micro-credentials to a single AQF level, including the following:

- skill development offered by micro-credentials may be demonstrated at several, if not all AQF levels;
- do not comply to minimum criteria and standards and come in uniform packages of time, complexity or mode of delivery; and
- micro-credentials do not have a relationship to existing AQF qualifications.

Learnings provided by other countries, such as that proposed in the "Other countries – shorter form credentials in qualifications frameworks", should be noted. Adoption of any approach must have flexibility foremost in mind, and the proposed approach to include micro-credentials with too much prescription within the AQF framework, may limit the capacity for market competition, further entrenching an environment of indistinguishable higher education qualifications within Australia.

- Griffith University supports maintaining a balance between flexibility and prescription. Micro-credentials include a very diverse range of activities that may be located at all AQF levels and in the short term it may be useful for providers to develop practice that can be codified in the future. This represents a more practical evidence-informed approach to including micro-credentials in the national qualifications framework. Griffith University has a strong credit policy that recognises informal and non-formal learning. Application of such an internal quality assurance process could be used when determining the admission value or the value of credit that could be granted for a short form activity such as a micro-credential.

4.1 Response to Possible Approaches

- Support inclusion of a limited range of micro-credentials in the AQF; as an emerging credential aligned to AQF level descriptors and learning outcomes criteria.

- Support a clear framework to certify only selected defined shorter form credentials, that establishes inclusions as well as exclusions.
- Support clarification of the relationship between the full suite of AQF qualifications in their AQF level descriptors and shorter form credentials.

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

The increased demand by employers to have a workforce that has well-developed soft skills has resulted in a need to consider the extent to which these skills should be specified in the AQF or reflected in individual qualifications. There is no agreement within the education sector as to how soft skills are to be taught and assessed, but as the AQF is a framework of qualification types, any defined skill would need to be as follows:

- related to the core content of the qualification;
- acquired through the process of learning and teaching; and
- assessed and reported in ways that are fair, valid and reliable.

Given the strong discipline and industry voice around enterprise and social skills, the interpretation of what soft skills are contextualized by discipline regularly undergo revision. This presents a challenge to approaches that might try to adopt a generalized definition of soft skills in AQF qualifications. In addition, the AQF does currently include some generic skill sets however, such as fundamental skills (literacy, numeracy), people skills (working with others, communication), thinking skills (learning to learn, decision making, problem solving) and personal skills (self-direction, acting with integrity). The AQF incorporates these skills into the level and qualification descriptors, but many of these skills are not included in the AQF qualification type specifications. Complication of the AQF taxonomies with further elaboration of soft skills could potentially devalue qualification requirements when enforcement of standards for soft skills becomes difficult. There is also disconnect between ACOLA review recommendations and the proposal in to include soft skills for level 10.

- Griffith University therefore supports the value of referencing enterprise and social skills in the AQF, however it should be left to institutions to determine how to embed these within programs.

4.2 Response to Possible Approaches

- Support identifying the list of enterprise and social skills but leave the list removed from the AQF taxonomies. Allow the flexibility for each provider to determine the mode of delivery, soft skills measurement or assessment and evidence provision for students, which may occur separately yet in conjunction with award of an individual qualification.

4.3 AQF taxonomies and levels

Internationally, most countries use level descriptors to outline knowledge and skills, which are then used to describe other qualities that apply to qualification types. Use of the AQF levels only to describe knowledge and skills and their application and provide a description of each qualification type that is linked to levels would improve the international relevancy of

Australian Qualifications.

The current application of knowledge and skills domain for AQF Levels 8 and 9 has led to multiple interpretations for Masters, Graduate Certificates and Graduate Diploma qualifications in the sector. This is confounded by the inclusion of Honours qualifications at AQF Level 8. Higher education languages diplomas also struggle to align with the current AQF. From a higher education perspective, distinct levels occur with the bachelor degree, the honours bachelor degree, PhD and coursework Masters.

- Griffith University therefore supports the reduction in the duplication of knowledge and skills and raises concerns regarding the different qualifications at level 8 and 9.

4.3 Response to Possible Approaches

- Support use of AQF levels only to describe knowledge and skills and their application and provide a description of each qualification type that is linked to levels.
- Support review of the application of knowledge and skills domain of the AQF taxonomy and how it should be applied across the AQF levels 8 and 9.
- Support revision of the descriptors to simplify them and ensure clear distinctions between levels.

4.4 Senior secondary school certificates

Australian senior secondary certificates of education (SSCE) are in the AQF, but do not clearly align with a single AQF level as they have a wide range of learning options along with a focus on meeting essential literacy and numeracy requirements; these can include senior school subjects, vocational education and training, workplace and community learning, as well as university subjects undertaken while at school.

- Griffith University therefore supports leaving senior secondary school certificates out of the AQF.

4.4 Response to Possible Approaches

- Support not assigning an AQF level to SSCE's and exploration of the AQF to better reflect the purpose of the SSCE to prepare students for further study or work.

4.5 Volume of Learning

There does not appear to be grounds to reform the volume of learning, as an Australian standard exists in the form of an EFTSL, which in the AQF (*Volume of Learning: An explanation v2 2014*) is quantified - the length of a full-time year, for educational participation, is 1200 hours. That is, that volume of learning is expressed as years in the AQF which in the Higher Education Support Act legislation is converted to hours through the definition of an EFTSL (equivalent full time student load) (*HESA 2003, Chapter 5.2, Division 169-27*).

The EFTSL as an existing standard reference which is an equivalent full-time student load for a year, and is a measure, in respect of a program of study, of the study load for a year of a student undertaking that course of study on a full-time basis. The definition of an EFTSL, as recorded in the legislation, can be made that 1 EFTSL is equivalent to 1200 hours.

Furthermore, there already appears to be consensus across a broad selection of Australian Universities that 1 EFTSL is equivalent to 1200 hours of coursework. The evidence, and current practices of Australian universities, would suggest that there is already an agreed standard for sector, without the need for additional regulation and oversight. The focus on EFTSL still permits subtlety and changes such as trimesters.

Changing the volume of learning unit of measurement from years to hours would unnecessarily complicate the definition of the 'value of unit of measurement', through association with 'hours of delivery by teacher' not 'study by student', along with definition of minimum proportion of guided learning for each qualification. An hours-based credit point system in the AQF that may be voluntarily referenced by providers is unlikely to be able to be implemented as many providers are locked into IT systems that drive their administration of credit points.

- Griffith University therefore does not support a suggested move to a common credit point system as there is strong concern that creation of a standardised/centralised credit precedence database would be onerous to develop and maintain and would not provide clarity to students.
- Defining volume of learning in terms of a 'new learner' would not improve the clarity of the measure.

4.5 Response to Possible Approaches

- Do not support changing the terminology from average learner to new learner.
- Support use of EFTSL as the Australian standard for volume of learning.
- Do not support an hours-based credit point system in the AQF

5.1 AQF Policies and explanations

The quality assurance of the Australian Higher Education system is provided by the HE standards in conjunction with the AQF. Although a degree of overlap of the Standards with the AQF policies may be apparent, the AQF does provide clarity on specific issues.

5.1 Response to Possible Approaches

- Support the Retention of the AQF Qualification Type Addition and Removal Policy and AQF Qualifications Issuance Policy to preserve the quality and integrity of issuing a testamur and record of results for graduates. Removal of these policies may stimulate fraudulent practice.
- Support removal of the redundant policies, such as AQF Qualifications Register Policy, where no registers exist.
- Do not support development of a shared credit transfer register, as this would be highly challenging to create, out-of-date at its inception and unreasonable to maintain.

5.3 AQF Explanations

The current guidelines published by ASQA, TEQSA or other regulators are informative and enable effective and transparent implementation of associated AQF policies.

5.3 Response to Possible Approaches

- Support the use of relevant guidelines for explanations of AQF policies and other issues.

References

- *Volume of Learning: An explanation v2 2014* <https://www.aqf.edu.au/sites/aqf/files/volume-of-learning-explanation-v2-2014.pdf>
- *Higher Education Support Act 2003, Chapter 5.2, Division 169-27 Meaning of EFTSL* <https://www.legislation.gov.au/Details/C2019C00033>

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