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)

Regional Universities Network

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

The AQF provides a useful framework and description of qualification types which can help consumers understand the meaning of certain qualifications and which provides a basis for comparison of qualification types internationally. The AQF is a useful vehicle for supporting pathways through education and training and between sectors, allowing for recognition and credit arrangements that facilitate student mobility.

There are several areas where RUN considers the AQF needs to be changed to ensure it continues to fulfil its purposes.

The AQF is too complex. It is important that the AQF be easily understood by the broader community. RUN supports simplifying the AQF so that the framework is clear, with succinct and explicit descriptions of the levels and qualification types and the differences between them. It needs to be able to encompass and enable new developments in education design and delivery, such as shorter form credentials and apprenticeship

degrees, without being prescriptive. It can do this best as a coherent, high level framework that is set out simply and clearly. It does not need to describe every form of credential or qualification that might develop.

The AQF should focus on the outcomes of learning: the skills and knowledge acquired and the ability to apply skills and knowledge, as certified by the qualification.

RUN universities have a strong equity focus, with higher than average numbers of part-time students, off-campus students, students with disabilities, and Indigenous, low SES and regional and remote students. Many of our students participate in university in a stop-start pattern extending over a number of years. A notional volume of learning that is based on how long a "typical" full-time student with continuous enrolment would take to complete a qualification does not reflect the experience of our cohorts. RUN acknowledges that the Volume of Learning that is specified in the AQF is indicative; it is not a requirement. However, this can be confusing.

The AQF must continue to support pathways for students through qualifications and sectors by providing a coherent, logical framework. RUN does not support any change to the AQF that would mandate the amount of credit that one qualification should be given towards another or require that all qualifications at the same AQF level be granted the same amount of credit by a receiving institution without regard to other considerations. These arrangements are best left to the institutions, which have the expertise and the connection with students.

The Panel might consider ways in which institutions can be encouraged to be more transparent about their credit recognition approaches and any articulation arrangements that they have in place. This would provide students with more clarity. It would also be consistent with the findings of the Regional Expert Group that is developing a Regional, Rural and Remote Education Strategy.

The hierarchical structure of the AQF is problematic in a number of ways, not least in perpetuating community perceptions about the relative value of VET and higher education. While pathways in any direction are possible, the hierarchical structure puts the focus on pathways from lower AQF levels to higher AQF levels. It can be difficult for a graduate of a degree program to receive credit for that learning when seeking to enrol in a lower level AQF qualification delivered in the VET sector, even where that second qualification is relevant to the first. The hierarchical structure also creates difficulties in determining where to fit qualifications which may span different AQF levels, such as the SSCE and shorter form credentials, and how to deal with different qualification types which are placed at the same AQF level. Attention needs to be given to the anomalies that occur from the levels-based structure.

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.

A simpler AQF taxonomy

The AQF needs to be simplified so that it is a clear representation of the levels and qualification types. RUN supports the Panel's proposal to describe the AQF levels in terms of knowledge, skills and application of knowledge and skills. The description of qualification types should focus on the defining characteristics of each qualification type and the points of difference between them, rather than trying to describe slight increases in complexity from one to another. Material that is not related to this or is found elsewhere should be removed.

The Panel's proposal to give more consideration to the "application of knowledge and skills" domain and how it is applied across the AQF levels is of interest. The level of complexity of "application of skills and knowledge" does not increase in a linear relationship with skills and knowledge through the levels. A different treatment of factors such as autonomy and accountability has the potential to recognise the significance of these factors in trade qualifications, and could also assuage some of the concerns that "VET qualifications" are less challenging or of less value than higher education qualifications.

Volume of Learning

The notional Volume of Learning is problematic. It is an artificial construct that bears little resemblance to reality in many cases. The proposal to base it on the time a new learner would need to complete a qualification would not necessarily remove the confusion around it. The majority of students at regional universities have not commenced their studies immediately after leaving school. They often have employment experience and family commitments that affect both their pattern of participation and their approaches to learning.

Nevertheless, a time-based measure can be a useful part of a risk-based approach to regulating education and training as it provides a basis for questioning the providers of unusually short courses which deliver poor educational outcomes.

If the decision is made to retain a time-based measure within the AQF, then RUN supports moving away from the current Volume of Learning, based on years of study, and adopting a credit points system based on hours. This would be more relevant to many of our students and might assist in the recognition of shorter form qualifications. As is currently the case, it would be an indicative measure, not intended to be prescriptive, and this point should be made clear in the AQF.

Anomalies at Level 8

The inclusion of the Graduate Certificate and Graduate Diploma qualification types at AQF level 8 is problematic. They are often both parts of a nested degree qualification, where the Graduate Certificate is nested under the Graduate Diploma even though they are theoretically at the same level of complexity in terms of the AQF. The Panel's proposal to describe more clearly the distinctions between qualification types at the same level would be an improvement. However, consideration could be given to separating the Graduate Certificate and Graduate Diploma into different levels.

Dual Sector Qualifications

There is considerable variation in the outcomes from dual sector qualification types at the same level. The outcomes from a vocational Graduate Certificate and vocational Graduate Diploma are not always the same as higher education Graduate Certificates and Graduate Diplomas. The same can be said of the Levels 5 and 6 qualifications. This does not mean that qualifications achieved in the different sectors do not meet the requirements of the AQF in terms of knowledge and skills. The pedagogical and assessment approaches and the focus of outcomes differ. This is acknowledged by TEQSA (quoted in the Panel's paper) which notes the additional design requirements in higher education and considers that credit into a higher education program should be different for higher education and VET diploma holders.

The AQF should continue to set out requirements for qualification types which apply equally across sectors. It cannot be expected to account for differences in the quality of outcomes from particular courses for particular students and how that translates into awarding credit towards entry to a higher AQF level course at university. It is imperative that universities retain the discretion to make decisions about credit recognition as they have the expertise, the on-the-ground knowledge and connection with the students. RUN

would not support any change to prescribe or mandate credit recognition arrangements.

Students would like clarity about the credit that their qualification will be given towards a further qualification. The Expert Advisory Group which is developing a Regional, Rural and Remote Education Strategy has proposed greater consistency across the sector in approaches to credit transfer and recognition of prior learning. Universities could be asked to provide easily accessible information to students and the public about their credit recognition policies and approaches. Consideration could be given to adopting a similar approach to that used in the Admissions Transparency Project. RUN would support the development of guidelines that inform the recognition of prior learning by universities but do not prescribe amounts of credit or credit points to be given for particular qualification types. RUN will look at applying a more consistent, transparent and transferable system of recognition within and across its member universities.

RUN would not support any move to draw a line between AQF levels and assign certain qualification types to VET and others to higher education: for example, to limit VET providers to delivering courses up to AQF Level 6 or limit universities and HEPs to AQF Level 7 and above. This would cause great disruption in the tertiary sectors and would work against the development of pathways to support lifelong learning. RUN universities have many students enrolled in Certificate and Diploma courses. The RUN student cohort typically moves in and out of study, so it is important that universities can offer entry pathways as well as exit points into/from degree programs, for example at Diploma level, giving students the option to build capacity or to return to study at a later time and have full recognition of the outcomes achieved in the nested qualification.

Enmeshed qualifications

Some higher education degree programs contain elements from lower AQF level qualifications, including VET qualifications. Where the university is not also a Registered Training Organisation, it cannot provide students with certification for the VET elements. This inability to give formal recognition disadvantages the students. It would be valuable for the Panel to consider how this could be dealt with in the AQF.

Shorter form credentials

RUN agrees with the statement in the Panel's paper that "inclusion of any shorter form credentials in the AQF should be driven by learner needs and provider responses to those needs, and not by an intention to expand the scope of programs subject to formal regulation and quality assurance through the AQF" (page 16).

The first group of shorter form credentials that the Panel describes are related to AQF qualifications but are not qualification types in the AQF (skill sets, VET short courses, incomplete qualifications). These are regulated and providers can make assessments about credit where students wish to continue on to an AQF. There is no need to include them in the AQF.

The second group is described as courses which prepare people for entry to AQF qualifications, including enabling and foundation courses and MOOCs that provide credit towards AQF qualifications. There may be merit in including enabling courses at appropriate levels of the AQF. These are established programs which are targeted to students who need additional support before commencing a university course, and are important in achieving improved outcomes for disadvantaged students. If a student undertakes an enabling program in a university which does not nest it within an AQF qualification, the student receives no credit or recognition for what has been achieved. Inclusion in the AQF would assist with recognition and portability for students. The AQF level would need to be determined and further consideration is needed of the implications for funding and regulation.

The third group is shorter form credentials which have no specific relationship with current

AQF qualifications, including micro-credentials and vendor courses. Micro-credentials are highly diverse and variable. The nature of many micro-credentials is that people do them to improve their prospects of a particular job, not because they necessarily want to go on to further study and achieve an AQF qualification. Recognition occurs in the job market. There does not seem to be a pressing reason to include them in the AQF. There is potential for a huge amount of administrative and regulatory work to be required, at significant cost, for what would essentially be courses at sub-subject level.

Universities could be asked to make information about their credit recognition policies and approaches relating to micro-credentials readily available to students and the public, as part of a broader approach to increase transparency about credit recognition.

Enterprise and social skills

RUN does not support the inclusion of further enterprise and social skills in the AQF. These should be determined by the provider in the context of particular qualifications.

Senior Secondary Certificate of Education (SSCE)

The school certificate is difficult to place within the AQF's hierarchy. It serves many purposes and is an important foundation for progression through to other forms of education and training. RUN supports the Panel's proposal that the SSCE descriptor should be revised to recognise that the knowledge and skills acquired in the SSCE can be at a broad range of AQF levels and result in multiple pathways.

AQF Pathways Policy

As the Panel has stated in the paper, "primary responsibility for providing pathways sits with providers, training package developers and regulators". The section of the Pathways Policy which lists percentages for credit that providers should award when students transition from a Diploma, Advanced Diploma or Associate Degree to a Bachelor degree in a related area is widely used. Guidance should also be given on the credit that providers should award when students transition from a Bachelor degree to a lower AQF qualification in a related area.

Development of a shared credit transfer register is not supported as it would require considerable effort to maintain as a current and useful resource. As noted earlier, RUN will look at applying a more consistent, transparent and transferable system of recognition within and across its member universities.

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.

The Review should consider the impact on students in terms of ensuring easy to navigate pathways through the framework.

Implementation of the AQF Second Edition involved significant work for universities in ensuring that courses and systems were compliant with new requirements. Any further changes to the AQF should be made in such a way as to minimize impact on providers in terms of regulatory burden, time and cost (for example, by aligning compliance with HESP 5.3.1).

Other