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 Gabrielle McMullen AM, Acting Vice-Chancellor

Respondent organisation (where relevant)

University of Divinity
For over a century, the University of Divinity has offered awards in divinity and its associated disciplines, defined by the *University of Divinity Act 1910* as 'studies in religion and ministry practice directly related to Divinity in its contemporary, historical, social and cultural contexts'. Under the Act, the University is accountable to the Victorian Minister for Higher Education. The University promotes the highest standards of learning, teaching and research in theology, philosophy and ministry. Through its scholarship, the University aims to address the issues of the contemporary world. The University consists of eleven Colleges located in Melbourne, Adelaide and Sydney. Each College is a unique learning community, supported by a wide range of churches and religious orders which together resource the University as a whole.

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

The University of Divinity welcomes the invitation to make a submission to the Review of the Australian Qualifications Framework (AQF). This submission is informed by the participation of senior members of the University of Divinity in a recent stakeholder consultation in Melbourne.

Education and training have grown to become a major element of Australia's services industry and of its export earnings. Ensuring the quality and fitness for purpose of Australian education and

training is critical to maintaining this prominence but, importantly also, to enhancing the quality of life of Australians and overseas students through a 'palate' of lifelong learning.

This review is timely in the context of growth of student numbers, emergence of new skills requirements, greater career mobility across both fields and locations, and ensuring the innovation, flexibility, diversity and quality of Australia's VET and higher education in a global context.

The University of Divinity, with Colleges in three states and graduates working across Australia and internationally, strongly endorses the AQF's role in promoting the quality of Australian education and training and national and international mobility. The framework's role in providing clarity about Australian qualifications and ensuring transparency across sectors with diverse providers is critical to the quality of Australian education and training. Revisions to the AQF which enhance such clarity and transparency and promote understanding of the nature of Australian qualifications will ensure the relevance of the framework in a changing national and international context.

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.

Taxonomies and Levels
The University is supportive of the suggested refinement of the AQF descriptors to simplify and improve them to ensure clear distinctions between levels and clarity in relation to exit points. The University endorses the proposals to remove duplication between levels and qualifications, and to use levels only to describe knowledge and skills and their applications in parallel with a clear description of each qualification type linked to levels.

In particular, clarifications in relation to Levels 5, 6 and 8, which pertain to both the VET and higher education sectors, and distinctions between a Bachelor Honours degree and Graduate Certificates and Diplomas would improve transparency, clarify options for students, and benefit those seeking international mobility. At the same time, the University would see returning to sector-based qualification types for Levels 5, 6 and 8 as a retrograde step, negatively impacting upon the AQF's coherence and the capacity for enabling pathways. The inclusion of the prefix 'post' for describing Level 8 courses (i.e., Postgraduate Certificate and Postgraduate Diploma) would address misunderstandings whereby some employers and international education bodies have placed these qualifications at Certificate Level (AQF 1-4) and Diploma level (AQF 5). Further, this change would bring the AQF terminology into alignment with that of the United Kingdom.

Shorter-Form Credentials
The University sees options to include recognition of shorter-form credentials in the AQF, at a variety of levels, as a worthwhile development, given appropriate means to assure the quality of the components. Incorporating into the AQF the means potentially to aggregate shorter-form credentials towards full qualifications would be a valuable in working with partners and recognising learning from other contexts, providing students with flexibility, avoiding duplication, and optimising education and training resources. One option would be to allow appropriate block credit for micro-credentials into an award in the same field or discipline up to the value of the electives of the award. This would provide a means of recognising short courses, whilst not compromising the integrity of the award.

Enterprise and Social Skills
In the context of providing higher education in Divinity and related disciplines, the University would welcome the recognition of social skills, acquired through teaching and learning and duly assessed and recorded. In particular, incorporating the 'domains of interpersonal and human intelligence'

and 'growth' would be a means to ensure holistic development of graduates and to address requirements of employers in relation to work-ready graduates. The type of skills listed – adaptability, collaboration, communication, critical thinking, empathy, global mindset, learning agility, and resilience – align well with the University's learning and teaching philosophy and graduate attributes. The latter, which shape all its courses of study and establish the University's aspirations for its graduands, are: *learn, articulate, communicate, engage and serve*.

While the inclusion of enterprise and social skills would be problematic in the VET sector where minimums in these areas are hard to establish, an alternative would be for training bodies to be mandated to report on the record of results for each graduate, for use by employers, the enterprise and social skill level reached.

Volume of Learning and Credit Points
Changing the volume of learning measurement from *years* to *hours* would foster flexibility for students, and provide credit guidance and potentially accelerated learning options. The focus on 'the number of hours for a qualification type on the needs of a learner <u>new</u> to the field of study' appropriately addresses recognition of students' prior formal and informal learning, while highlighting the breadth and depth requirements of entering a new field of study. If the concept can be systematically developed, the University is supportive of redefining the volume of learning measurement as proposed.

The University encourages exploration of implementing a shared credit transfer register, an hours-based credit point system in the AQF voluntarily referenced by providers, and simplifying comparison of learning outcomes for students and providers. The outcomes of improved transparency, enhancements in the recognition of prior learning and credit provision, and enabling comparisons with international qualifications would benefit students, providers and industry.

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.

In providing a contextual statement for the AQF, the review panel is encouraged to foster a commitment to lifelong learning, and to promote the value of the different sectors and formal and informal learning.

The policy framework is critical to the implementation of changes signalled in the review paper and sector briefings. Further, a robust policy framework can be utilised to address inappropriate practices, such as minimising recognition of prior learning to maximise revenue.

Specifically, the University offers the following input in relation to the *AQF Qualifications Pathways Policy.*

AQF Qualifications Pathways Policy
The *AQF Qualifications Pathways Policy* sets the benchmark for sector-specific policies. It is valued for encouraging recognition of prior learning, providing guidance regarding credit and promoting good practice. For example, clause 2.1.10 provides a helpful platform for negotiation, however the listed credit arrangements apply only to related area transitions. A student's lifelong learning journey will often include career transitions and training in diverse fields. It may therefore be helpful to supplement clause 2.1.10 with upper and lower limit credit guidelines for students with prior awards transitioning to unrelated fields or disciplines, thereby providing a 'platform for negotiation'.

In the way that clause 2.1.10 supports clause 2.1.9, the University suggests the introduction of an addition following clause 2.1.7 to support the granting of block or unspecified credit. As noted above, the University supports the recognition of micro-credentials and short-form courses as prior learning with respect to AQF awards. An addition subsequent to clause 2.1.7 would strengthen the policy in this regard, guiding providers in both the VET and higher education sectors in relation to the provision of block credit up to a maximum of the elective component in any award for prior learning in the same field or discipline. This provision would promote pathways between the sectors and create a mechanism for recognising micro-credentials without compromising award integrity.

Further, while the current *Pathways Policy* has made allowance for provision of block credit (clause 2.1.7), the VET sector requirements relate to specific Performance Criteria. It is recommended that the revised policy allow for students to meet (a maximum of) the elective units associated with a VET award by block credit if in the same field or discipline.

Other

The University is strongly of the view that proposed revisions to the AQF and associated policies should enhance options for stakeholders – students, providers and industry – enabling them to benefit from pathways between and within the sectors, with appropriate recognition of prior learning and provision of credit. Aligned with these provisions, sector-specific standards underpin the integrity of Australian education and training.

It is timely that the review of the Higher Education Provider Category Standards, to which the University of Divinity has also made a submission, is being conducted in parallel with the AQF review to optimise the provision of innovative contemporary education and training to meet the future needs of Australia and increasingly mobile lifelong learners.

The University appreciates the opportunity to contribute to the AQF review and wishes the review panel well in completing the task and arriving at recommendations.