



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)

Australian Occupational Health and Safety Education Accreditation Board (AOHSEAB)

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

The AOHSEAB through accreditation of tertiary level OHS qualifications strives to ensure that OHS professional education is based on; education objectives and graduate learning outcomes, robust educational design and review processes, and that delivery of learning is appropriate to develop graduates equipped with the knowledge and skills to enter the workplace as an entry-level generalist OHS professional.

The accreditation standards developed and used by the AOHSEAB are mapped to the Higher Education Standards Framework (HESF) and the AQF. The AQF Qualifications descriptors in particular the skills, knowledge and application of those skills and knowledge are used as a reference to guide discussion by our assessment panels when there are areas of potential concern about the qualifications being assessed. The wording of these qualifications descriptors (Bachelor, Bachelor with Honours, Graduate Diploma and Masters) provides clarity to inform decision-making by the accreditation

panel and the AOHSEAB.

OHS is a multi-disciplinary field, and the majority of OHS professionals have an initial qualification (and work related experience) before adding an OHS qualification (at VET or HE level) to their portfolio. An issue is that the AQF can be perceived to be mono-directional. In other words, it appears as if you are intended to start at the bottom and work your way up, whereas in reality people undertake study at different levels within the framework that meet their needs at that point in time.

Many employees undertake a range of short courses in OHS relating to Health and Safety Representative training, safety auditing, safe removal of Asbestos, incident response, incident investigation, identification of hazards, risk assessment etc.. This type of practical OHS training is not currently recognised under the AQF. While some of these programs require approval under OHS/WHS legislation (and therefore have standards against which they are measured), others are developed by providers to meet the demands of industry and vary widely in terms of quality, outcomes delivered and value for money.

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 AQF should be broadened to accommodate different durations of study at similar levels of complexity, and describe a range of pathways that occur not only vertically (both up and down) but also horizontally to capture a range of technical (specific) and generic skills and knowledge as well as the application of those to inform professional practice within the discipline being studied.

The AQF could usefully adopt a matrix approach based on expected learning outcomes across the range of levels adopted such as the Scottish and Irish models outlined in the further information to support the discussion paper released by the panel.

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 AQF new skills document notes that micro-credentials could be combined to build formal qualifications. The AOHSEAB does not support that full qualifications can be built from stacked micro-credentials, although it does support the proposal that they be able to be recognised for the purpose of RPL or as electives.

The reason for this position is that the tacit inter-personal skills, self-awareness and self-management capabilities that are built by a learner during participation in a formal qualification are essential to them being able to undertake work safely (in both the physical and psychological sense) in a future world of work. If people are working in more isolation through globally networked organisations, working in the gig-economy, taking their skills to a range of workplaces, then the range of interpersonal and communication skills and attributes such as resilience that they build in undertaking an extended course of study are important to their future well-being.

Working safely requires a broad understanding of the complexity of work process and the ability to take a step back and look at the how well the various parts of a workplace are interacting. Micro-credentials are by definition short and stand-alone learning programs, delivering small intense packets of knowledge and some enterprise and social skills to the learner. The danger of stacking these to form a qualification is that they cannot (by their nature) present a coherent and systematic exploration of a body of knowledge such as that which underpins a formal qualification.

The benefit of credentialing short courses /micro-credentials in an expanded AQF framework is that defined standards would be developed to drive consistent learning outcomes, and courses mapped to the AQF would then be subject to robust quality assurance processes.

Other

Many skilled migrants seek recognition of their overseas OHS qualifications for the purpose of becoming a certified OHS professional within Australia. An AQF that enables better alignment and mapping to international qualifications frameworks could simplify this process.