



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

Alice Summers

Respondent organisation (where relevant)

Department of Home Affairs

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

AQF is currently fit for purpose from a visa policy perspective.

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.

N/A

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.

Nil comments on discussion paper.

If changes are made to the number and composition of AQF levels, including the name of the levels, and qualifications ascribed to each level, such change would have a substantial and costly impact on the current legislative, systems and processing framework which supports the delivery of visa programs administered by the Department of Home Affairs (the Department).

Specifically, a reduction in the number of levels, would have a direct impact on visa policy settings and would require amendments to the *Migration Regulations 1994*. This would impact a number of visas, including:

- Student (subclass 500) visa
- Temporary Graduate (subclass 485) visa
- Skilled Migration points-tested visas.

Qualification name changes

Changes may be required to the current definitions of qualifications in visa legislation.

For example, under the Skilled Migration points test, prospective migrants can claim points for educational qualifications they have obtained. The qualification definitions are legislated and regulation changes may be required, depending on the AQF changes. For example, the definition of 'trade qualification' references Certificate III.

Changing the definitions of qualifications may also impact on the Australian Study requirement and / or the English language requirement.

Qualification level changes

Depending on the final settings, the Department may need to review the points allocated to different levels of qualifications under the points test. For example, if Graduate Certificate and Masters degrees are in the same Band, allocation of points may need to be recalibrated. Explanatory statements for different qualification levels and types will be extremely helpful for this purpose.

Student visa condition 8202 requires a Student visa holder to maintain enrolment in a registered course that results in an AQF level qualification equal to or higher than the AQF level course in relation to which the visa was granted. If agreed by Government, a reduction in the number of AQF levels (eg. from 10 to 8), would make this Student visa condition difficult to administer and would require the development of complex transitional arrangements.

The associated regulation and instrument changes, and the likelihood of a remedy necessitating grandfathering/transitional arrangements would not be welcomed by the international education sector or international students.

Visa processing implications

Clarity of AQF level is critical to facilitate the processing of visas. It is not clear how the overall AQF level by qualification will be derived, given the number of bands in (1) Skills and (2) Knowledge does not equate to the number of bands in (3) Application of Knowledge and Skills.

If the amount of learning assigned to each qualification was to be defined by the number of hours (instead of years), the Department would need to consider how to assess overseas qualifications. It may take the Department significantly more time to assess visa applications. There may also be implications for the assessment of overseas qualifications and their equivalency with Australian qualifications for skilled migration purposes. It may be more difficult for prospective migrants to self-assess the number of points they can claim at the Expression of Interest stage.

Systems Implications

There may be significant and costly systems work associated with the changes and in the way data is transferred between agencies in the administration of the Student visa program (Department of Education to Home Affairs). For data transfer purposes, the messaging between agencies would need to be updated for those courses that change AQF level and the definitions would need to be reset in the receiving systems and databases to reflect the change.

ANZSCO

The Department also relies heavily on ANZSCO (Australian and New Zealand Classification of Occupations), the agreed classification system of occupations in the Australian and New Zealand labour markets. The ANZSCO refers to the AQF framework in setting the applicable skill level to an occupation. The Department would not be able to effectively operate unless the proposed new AQF framework is also adopted in ANZSCO, noting that updates to ANZSCO are not regular and require agreement from both Australia and New Zealand.

Skills Assessments

While the Department is not involved in the skills assessment process, many skilled visas require skills assessments. Educational qualifications are part of the skills assessment criteria undertaken by Skills Assessing Authorities. The proposed new AQF framework would have an impact on these assessment criteria.

Summary

The benefits of a change in AQF framework need to be balanced against the significant complexity of the associated legislative amendments required and the associated financial and resource implications it would necessitate across portfolios.

From a visa programs' perspective, it is difficult to see how the benefits of a change in the number of levels, could be proportionate to the expansive and costly range of issues the Department would need to address and remedy.

Further detailed analysis would be required to assess the full impact on the Department of Home Affairs.

Please refer Attachment A for more detail on use of the AQF in the *Migration Regulations 1994*.

Other

Nil