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.

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

> **The Australian Technology Network of Universities (ATN) believes the AQF plays a pivotal role in the Australian education environment. As such, we believe that any changes to the AQF are carefully considered lest they cause unintended consequences. The ATN would happily continue to engage with the panel to discuss potential impacts of any proposed changes, once proposed changes are clearly articulated.**
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> **The ATN believes, at the current point in time, the AQF is fit for purpose and does not require substantial changes. Further, the ATN believes that there are no circumstances that warrant change to the AQF and we are concerned that any material changes may upset the balance of levels and qualifications currently in place. While there are issues with the taxonomy in the AQF as outlined in the consultation paper, the ATN urges caution and any proposed changes must be subject to careful consideration and further in-depth consultation.**

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.

> **As outlined above, the ATN does not believe that change to the AQF is warranted. Despite this, the ATN has attempted to offer constructive feedback on a range of proposals raised in the consultation paper.**

The market for short course offerings is rapidly changing in the Australian higher education context as providers become more sophisticated in their offerings. As such, the ATN does not feel that there is a current need to include these in the AQF, rather the ATN would support a New Zealand styled approach of recognising the credentials without including them in the national qualifications framework. Inclusion of these qualifications into the framework could be considered in a subsequent review once there is a more established market and clearer indication of how these courses could operate within the broader tertiary context.

The ATN does not believe enterprise and social skills need to be addressed further in the AQF and are currently covered in the range of skills required by the AQF and the Higher Education Standards Framework.

The ATN does not support a move to change the measure for volume of learning from years to hours. Adding greater clarity to a year being recognised as an Equivalent Full Time Study Load (EFTSL) would assist in any confusion relating to the volume of learning.

The ATN does not support the removal of suggested duplicated level and qualification type descriptors, noting that several levels cover multiple qualifications. As such, the ATN believes it is appropriate to be able to describe the level for the purposes of international comparison and to guide any future changes in qualification types.

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 ATN does not believe the AQF should undergo substantial changes and as such, there should not be any implementation issues and regulatory impacts.

Other