VCD19/82

15 March 2019

Professor Peter Noonan
Chair, AQF Review Panel

By email AQFReview@education.gov.au

Dear Professor Noonan,

RE: Review of the Australian Qualifications Framework

The University of New England is pleased to respond to the Minister's call for submissions regarding the Australian Qualifications Framework.

As you would be aware, UNE is located in Armidale, New South Wales and was the first Australian University established outside a capital city, with a history dating back to the 1930s. UNE is one of Australia's great teaching and research centres, with a unique regional perspective. The university has been a long-time advocate and innovator of flexible study; committed to helping students from all backgrounds and locations to access education.

In the attachment we respond to the issues and questions canvassed in the Discussion Paper and in the presentation used in the stakeholder consultation process:

1. Purpose of the AQF
2. Short Form Credentials
3. Enterprise and Social Skills
4. The AQF Taxonomy and Levels
5. Volume of Learning and Credit Points
6. Other Issues

Please do not hesitate to contact me if you would like to discuss any aspect of our submission further.

Yours sincerely,

Professor Annabelle Duncan
Vice-Chancellor & CEO
University of New England

Review of the Australian Qualifications Framework (AQF)

1. Purpose of the AQF

The Discussion Paper notes the ambitious scope of objectives outlined for the AQF in its Second Edition[1], from supporting individualised lifelong learning to facilitating alignment with international qualifications frameworks.

There is, however, a lack of clarity and cohesion around the purpose of the AQF which makes its fitness-for-purpose difficult to assess and comment upon. Apart from their statement, the objectives are not linked in any way to the structure or content of the AQF.

A formal statement on the purpose of the AQF should cover the different purposes it may have for employers, industrial associations, professional bodies, and educational institutions and should take account of what the future pressures on, and requirements for, the AQF may be.

2. Short Form Credentials

Short form credentials, often referred to as micro-credentials, are certifications of modular courses and recognise an individual's knowledge acquisition or achievement of competency in an often highly focussed area of study.

Short form credentials are not currently recognised within the AQF and it is difficult to see where they might be located within the current structure. The suggestion that they could be assigned to a level depending upon the depth and rigour of the content ignores two important points. First, that the focus of AQF is about standardisation and structured pathways between standardised levels, rather than about utility of information for individuals and employers. Second, that the fundamental benefit of such credentials is their diversity and the flexibility that providers have to shape them quickly to suit employers' and employees' needs.

A strength of the current qualifications system is the ability of stakeholders to utilise both regulated long form courses and unregulated short form courses to meet training and education needs.

3. Enterprise and Social Skills

The Discussion Paper proposes that the list of enterprise and social skills included in the AQF be expanded and further detail of the skills included in the AQF. It is further suggested that these skills would not form part of the AQF taxonomy (presumably remaining as an element in the stated learning outcomes).

UNE does not support the inclusion of additional skill categories, preferring to see greater clarity around the existing categories and their expression against the AQF levels. The principal problem is that the skills are presented as a hierarchy related to the ten AQF levels. The skills requirement becomes more difficult as the qualification progresses from Level 1 to Level 10. This is not a proper reflection of the skills development delivered or acquired. The skills requirements of some qualifications in the vocational education and training (VET) levels will be no different to those in the higher education levels and require a higher level than is currently reflected in the AQF.

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[1] Australian Qualifications Framework, Second Edition, January 2013, p. 8.

4. The AQF Taxonomy and Levels

As outlined above, UNE would support the review of the knowledge and skills domains and how they should be applied across the AQF levels.

The AQF presents as hierarchical in nature, largely based on a principle of increasing difficulty or complexity of the knowledge and skills, and their application, as one progresses through the AQF levels. This does not accurately reflect the reality that some VET qualifications require higher levels of achievement on some descriptors.

The proposal from the Panel that it review descriptors to simplify them is supported. However, ensuring that there are clear distinctions between levels is not supported as it is likely to continue the emphasis of a single hierarchical qualifications structure. The AQF needs to be structured in a manner which encourages collaboration between the VET and higher education sectors.

The ten levels of the AQF have an historical basis in job classification systems rather than arising from a greenfield decision on the best way to frame a qualifications classification system. We do not believe that a single 10-point scale is an adequate structure to reflect the distinctions between different qualifications – particularly between those classified as VET and those classified as higher education. We note the view that there is some duplication between levels. We do not believe that this is a significant issue provided the duplication is justifiable and accurately reflect expectations.

One area of particular concern is the potential for confusion, especially in international comparisons, is AQF Level 8 which covers a research qualification (Bachelor Honours) as well as two coursework qualifications (Graduate Certificate and Graduate Diploma). The Bachelor Honours has a volume of learning typically equivalent to a full-year of study while the Graduate Certificate may be completed in half that time. The complexity of skills and knowledge in the former is greater than the latter. They should not be situated at the same level. In addition, different higher education systems have different conceptions, and time requirements, of the Bachelor Honours qualification which makes international comparisons difficult.

5. Volume of Learning and Credit Points

Volume of Learning

The volume of learning is currently measured on a time basis in number of equivalent full-time years. It has been suggested that it would be more effective for volume of learning to be measured in hours. We do not support the change from years to hours. The Discussion Paper notes that a time-based approach is problematic as modes of delivery change and as new models of learning are adopted. A change from years to hours is still a time-based approach.

The suggestion that the time basis for a qualification type be based on the needs of a learner new to the particular field of study may be effective for those undertaking a qualification which is postgraduate in time but not for those whose qualification is postgraduate in nature (i.e., it is in the same field of study as their undergraduate qualification). For this reason, we do not support this proposed change.

Credit Transfer Register

Credit recognition and processes of advanced standing are well-established both between universities and between the higher education sector and the vocational education and training sector. The proposal to develop a shared credit transfer register seems to us to be unnecessary

and would potentially create substantial on-going work for providers. UNE supports the continued location of credit transfer policy and practice at the institutional level.

Credit Point System

We do not support the development of an hours-based credit point system that could be referenced voluntarily by providers. This would likely increase the complexity of the existing approaches and cause confusion amongst stakeholders.

6. Other Issues

AQF Qualifications Register Policy

UNE does not support the implementation of the AQF Qualifications Register Policy. Much of the value of this Register has been delivered through the Tertiary Education Quality and Standards Agency's (TEQSA's) National Register and there are no grounds for duplication.

AQF Qualification Type Addition and Removal Policy and Principles and Processes for the Alignment of the AQF with International Qualifications Frameworks

These Policies remains useful as the former provides a facility for recognising emerging forms of qualification and the removal of those forms which are no longer useful and the latter ensures comparability with international standards. However, both are largely dependent upon the existence of an AQF Council (which is now defunct). Clearly for the policy to be effective there needs to be a responsible body identified (perhaps Universities Australia).

AQF Issuance Policy

UNE supports the retention of the AQF Issuance Policy and placing responsibility for monitoring performance against the policy with the relevant regulator. An additional area that could be considered for inclusion is a provision around the minimum proportion of study that a student would need to undertake with a provider to receive that provider's qualification.