Review of the Australian Qualifications Framework: Discussion Paper

Navitas Response

15 March 2019

Navitas welcomes the opportunity to provide a submission in response to the Australian Government's Review of the Australian Qualifications Framework (the Review), led by Professor Peter Noonan.

Navitas acknowledges that this call for submissions is one step in an extensive review process and looks forward to participating in stakeholder consultation sessions and providing further recommendations and feedback prior to completion of the review in September 2019.

Recommendations underpinned by integrated tertiary education model

The recommendations outlined below are underpinned by Navitas's long-held belief that an integrated tertiary education sector model – that equally values the roles of vocational education and training (VET) and higher education (HE) – would best meet the education, skills and workforce needs of the future in Australia.

This model, supported by a simplified and more relevant AQF with a common qualifications nomenclature, would be flexible enough to respond to the ever-changing needs of industry while ensuring the highest standards of education and training are maintained. Importantly, it would provide a framework for lifelong learning; one that encourages students to move seamlessly between education and training providers in a unified sector in response to changing individual and workforce needs.

A single tertiary education and training sector, supported by one national regulatory, funding and policy model, would also ensure a level playing field between public and independent providers and consequently equitable access for Australian students, irrespective of their choice of provider. Our call for an integrated tertiary sector is consistent with the insights shared by other leading organisations that have a stake in Australia's future workforce, the generation of knowledge and the development of skills. These include:

- KPMG's *Reimagining tertiary education: From binary system to ecosystem,*[1] and
- Business Council of Australia's *Future Proof.*[2]

[1] https://home.kpmg.com/content/dam/kpmg/au/pdf/2018/reimagining-tertiary-education.pdf

[2] https://www.bca.com.au/future_proof_australia_s_future_post_secondary_education_and_skills_system

Responses to review questions

Navitas contends that, given the changing nature of learning, working and teaching, the current AQF is no longer fit-for-purpose and will not meet the development needs of a future, globalised workforce. While the framework has played an important role in the quality assurance of Australia's tertiary education system, the 10-level linear framework no longer reflects the learning needs of students, the skills needs of employers and the training and education needs of a productive, global economy.

In its current form the AQF is unduly complex, incorporating language and terminology that is not clearly understood by learners, providers or employers. Further, the hierarchal and linear nature of the AQF implies that a qualification of higher AQF level is more valuable than a qualification of lower AQF level. The risk is that skills are valued less because they are identified at lower AQF levels. The nomenclature and structure sends a mixed and often misunderstood message to students, employers and the community.

Importantly, the framework does not clearly define a method to define shorter form credentials and transferable skills that are increasingly being demanded by students and employers.

Navitas believes the AQF should be sector-neutral and applied to all levels of Australian education and training - senior secondary school, Vocational Education and Training (VET) and Higher Education (HE) - as a uniform, coherent framework.

To that end, Navitas provides the following recommendations for consideration by the review panel and seeks clarification of elements of the framework in its current form.

A non-linear framework

Navitas recognises the need for a framework in which qualifications reflect the complexity and depth of achievement and associated learning outcomes. We argue that the framework should move away from a single linear scale to a 'circular' model that enables and empowers students to move more seamlessly from one qualification to another in order to build knowledge and skills profiles that will meet individual and employer needs.

Navitas supports the assertion by PhillipsKPA, in its research paper on the international context for the AQF Review, that:

> *'Flexible and multi-directional pathways rather than simple hierarchical ones (as the AQF is perceived to be) are regarded as better suited to lifelong learning and rapid retraining to meet new technological challenges. Internationally, qualifications frameworks are being designed with a view to encouraging cross-sectoral collaboration and the engagement of employers and businesses in both designing and delivering 'on-time' and 'in place' learning experiences that can be recognised formally as part of a qualification.'*[3]

Taxonomy and descriptors

Navitas believes there the AQF is unduly complex, at times contradictory and vague terminology in its description of qualifications and levels. This creates confusion for students, providers, employers and the community.

Navitas recommends simplifying the descriptors to ensure relevance and clearly distinguishing between levels. A reformed AQF should clearly define (i) the volume and level of learning outcomes and (ii) the qualification type that is linked to these levels.

Further, to ensure Australian graduates are employable in a global economy, the AQF must align with international frameworks, particularly in markets that provide the greatest employment prospects for Australian graduates. This is particularly relevant to Level 8 and 9 qualifications.

Ambiguities in current framework

While Navitas reiterates its call for a sector-neutral, integrated tertiary education model, we also draw attention to ambiguities in the framework as it currently stands. Specifically, Navitas questions the rationale for enabling postgraduate programs (i.e. Graduate Diplomas and Graduate Certificates) to reside in the VET sector. This is ambiguous given the well-accepted view that bachelor programs are excluded from VET in the current AQF.

Further, Navitas suggests that the final two years of secondary school, including programs such as VET in Schools, should be clarified and incorporated into a reformed AQF framework. In the current framework, the Senior Secondary School Certificate (SSCE) does not align with any one AQF level even though there is an implied relationship as a required entry qualification to post-secondary study.

[3] https://docs.education.gov.au/node/50811

We support the 'Possible Approach' outlined in the AQF Review Consultation Presentation to:

> '*Revise the SSCE descriptor to recognise that the knowledge and skills acquired in the SSCE can be at a broad range of AQF levels and result in multiple pathways*'.

Navitas also believes that students who may not have completed a full AQF qualification – but have hit milestones within a qualification – deserve to have their progress recognised. The AQF should also deal more explicitly with qualifications relevant to international students such as English Language Intensive Courses for Overseas Students (ELICOS) and Foundation pathways.

Volume of learning and credit points

Navitas argues that while volume of learning is a key metric, its definition should be reconsidered to better reflect learning outcomes.

Given increasing demand for shorter form credentials to meet the demands of a rapidly changing and evolving workforce, Navitas recommends using a credit point system that reasonably captures volume of learning and does not equate course duration with volume of learning (See 'Recognising shorter form credentials').

Recognising shorter form credentials

Navitas recognises the increasing role that shorter form credentials (including micro-credentials, short courses, Work Integrated Learning and MOOCs) are playing in supporting employees to develop new capabilities and transferable skills that will enhance their sustained employability. These courses often provide students with a cost-effective, flexible way to (re-)engage in study and respond to a specific workforce need. Allowing learners to gain credit for these types of courses allows them to augment existing qualifications within the framework and helps to meet critical skills gaps.

To that end, Navitas recommends that the AQF be reformed to clearly recognise shorter form credentials in a way that does not undermine the quality and reputation of the system and the qualifications it delivers. The credentialing of non-AQF qualifications must also be able to be appropriately regulated in a manner that maintains quality while not increasing opportunity or financial costs within the system. We are not suggesting that shorter form credentials receive their own discrete AQF qualification level, rather that these credentials should be clearly aligned to the AQF. Navitas acknowledges there is already provision in the AQF to map these across different levels and emphasises that clarification is required.

Recognition of shorter form credentials as prior learning would be facilitated by a credit point system, as recommended above.

Embedding enterprise and social skills

Enterprise and social skills will play a significant role in the future employability of learners. AlphaBeta's report into the future of education and work in Australia asserts that tacit capabilities such as leadership, integrity empathy and creativity will be the vital skills required by a workforce that will be increasingly under threat from automation[4]. As a result, enterprise and social skills are central to a learner's future employability.

Navitas believes that relevant enterprise and social skills, and the relative level of competence to be achieved within each qualification, should be embedded into the way students learn at all levels of the AQF, but should not form another aspect of the qualifications framework itself. Skills and behaviours such as such as problem-solving, creativity, team work, critical thinking and communication should be consistent themes in a reformed, non-linear qualifications framework.

There are already examples of institutions embedding enterprise and social skills with positive outcomes. For example, SAE Creative Media Institute (within the Navitas group) currently employs a Transferable Skills Framework which supplements AQF program levels. This framework outlines a method of teaching via a deliberate practice model that aims to aid in a student's metacognitive development. SAE terms these as behaviours, informed by industry and stakeholder consultation, and they are comparable to what the review panel would consider to be enterprise and social skills.

Supporting change implementation

Navitas recommends consideration be given to the time required by providers to adapt to any changes to the AQF, and the support needed by providers to implement those changes. The Review Panel should also consider any concurrent changes to legislation and regulation arising from changes to the AQF (e.g. alignment of terminology to the Higher Education Standards Framework).

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[4] AlphaBeta 2019, *Future Skills*, P. 22