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

Australian Psychological Society

Respondent organisation (where relevant)

Australian Psychological Society

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

Please see body of submission below.

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.

Please see body of submission below.

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.

Please see body of submission below.

Other

Review of the Australian Qualifications Framework:

Submission by the Australian Psychological Society

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Introduction

One could argue that the Academic Qualifications Framework (**AQF**) requires a radical overhaul that would recognise the changing nature of education and be 'fit for purpose' for the benefit of Australian society into the future. That is, in theory, it would be ideal to be able to "start from scratch" and apply evidence-based policy to guide the determination of different AQF levels (and their characteristics) that recognised: (a) the diversity of desired educational outcomes from a long-term societal prosperity and wellbeing perspective (*cf.* short-term profit-driven perspective); (b) the impact of technology (disruptive, enabling, distractive) on how quality academic programs can be designed and delivered (including the administrative aspects); (c) the critical need for innovation in a rapidly changing world; and yet, also (d) the necessity for ensuring our population acquires the basic literacies (e.g., language, quantitative, communication, self-management, financial) that would facilitate autonomous and adaptive goal pursuit within the context of the complexities of the current and future Australian society.

We recognise, however, that such a radical overhaul (which could involve changing the entire educational sequence from primary through to doctoral level, including continuous professional development) will not be possible within Australia. This is for several reasons, including congruence with international academic qualifications, and the existence of entrenched professional accreditation standards. In this submission, therefore, we comment briefly on the Discussion Paper primarily in relation to psychology higher education and training, which is tightly regulated by the Australian Psychology Accreditation Council (**APAC**). Many points, however, will be relevant to all higher education provider (**HEP**) Academic Qualifications. We will also comment primarily on 2 sections – 4.1, and 4.2. In this submission, we will avoid the confusing term 'course', and instead refer to the units that make up a particular qualification program (e.g., 8 x 6-UOC units make up the Honours degree qualification – 2013 AQF Level 8 - for the FTE one-year program at UNSW).

4.1 A wider range of credentials could be included in the AQF

We have two points to make here: (1) the upper levels of the AQF could be extended to cater for the complexity of different Masters types; and, (2) micro-credentials are most usefully tied to units in existing degree qualification programs.

Firstly, there are currently three kinds of Masters qualification at the 2013 AQF Level 9, and two kinds of PhD at Level 10, as illustrated in the Table below.

Qualification	Duration (years)	AQF Level
Masters Degree (Research)	1-2 years, depending on whether completed Level 8 or 7 (respectively)	9
Master Degree (Coursework)	1-2 years, depending on whether completed Level 8 or 7 (respectively)	9
Masters Degree (Extended)	3-4 years, depending on whether completed Level 8 or 7 (respectively)	9
Doctoral Degree (Research)	3 – 4 years (post Level 8 qualification)	10
Doctoral Degree (Professional)	3 – 4 years (post Level 8 qualification)	10

The differences between various Masters and Doctoral level programs has always been a problem in the sector, and in psychology training in particular (see APAC, 2018, https://www.psychologycouncil.org.au/sites/default/files/public/Standards_20180912_Publis hed_Final_v1.2.pdf), and we propose that the Level 9-10 qualifications be expanded to encompass the diversity, as indicated in the table below.

Qualification	Duration (years)	AQF Level
Masters Degree (Research)	1 - 2 years, depending on a number of factors (not having completed Level 8 should add 1 year)	9a
Masters Degree (Coursework)*	1 - 2.5 years, depending a number of factors (not having completed Level 8 should add 1 year)	9b (in keeping with the broader scheme)
Masters Degree (Extended)**	2 - 3.5 years, depending on a number of factors (not having completed Level 8 should add 1 year)	10
Doctoral Degree (Coursework heavy, but meets RTS funding criterion)***	3.5 - 4.5 years (post Level 8 qualification)	11a
Doctoral Degree (Research heavy, and meets RTS funding criterion)****	3 - 4 years (post level 8 qualification)	11b

* For psychology: This would apply to Year 5 of the APAC 5+1 qualification (to registration), but also to "Bridging" specialist Masters programs (pre-requisite to endorsement) which are described on p.15 (APAC, 2018) as "typically a Masters Degree (Coursework). ** = This would apply to the APAC 2-year extended Masters programs (prerequiaite to endorsement), which are described as the non-typical "packaged program" on p.15. *** = This would apply to the APAC 3.5+-year Doctoral Degree (Professsional) programs) (prerequisite to endorsement, p.15). **** Research only qualification that does not lead to registration.

- **Level 9a**: The reason for maintaining the Masters (Research), despite its complexity, is that it may serve niche markets, but also it may serve as a stepping stone to a PhD.
- **Level 9b**: The Level 9 coursework Masters qualification level is in keeping with the AQF scheme, and is of two types for psychology: (1) the year 5 of the 5+1 'generalist' program as aligned with the APAC (2018) professional competencies: "Programs for professional competencies are typically a Masters Degree (Coursework)" (p.13), and (2) what was formerly considered the "Bridging Masters", but is described by APAC (2013, pl 15) as "typically a Masters Degree (Coursework). That is, unless we want to distinguish further at this level, there are two distinct '1-year' Masters programs in psychology, one generalist (5+1) and one specialist (which would follow the 5+1, or would following an extended Masters into a new speciality endorsed area).

- **Level 10**: The Level 10 Masters Degree (Extended) recognises the increased volume of learning and assumed greater knowledge and skill acquisition, and is, for example, compatible with the APAC (2018) professional competencies for specialised areas of practice: "A program may also be delivered as a packaged program… competencies both for specialised areas of practice as well as general registration " (p.15). We believe the volume of learning 'jump' between the 2013 Coursework and Extended Masters was one year too many, and so this has been adjusted from 3-4 to 2-3.5.
- **Level 11a and 11b**: The Level 11a Doctoral Degree (coursework heavy) meets the research training scheme (RTS) funding criterion of a research minimum of 2/3 of the program, which should be at least equivalent to 2 years. In psychology, for example, this is compatible with the APAC (2018) professional competencies for specialised areas of practice: "Programs for professional competencies for specialised areas of practice are typically a Masters Degree (Coursework) or a Doctoral Degree (Professional)" (p.15). The level 11b PhD is a standard doctoral degree program, being research heavy and meeting the RTS funding Criterion.

The benefits of this proposed schema is that it clears up a number of the problems with Level 9 and 10 and better recognises that more time spent learning leads to a higher qualification.

Secondly, the Review argues that employers are demanding micro-credentials, although it may be counter-argued that it is the responsibility of employers to provide in-house contextualised professional development for their employees. It should also be recognised that members of the workforce may independently and proactively seek to make a change in their career, or up-skill in their current career area.

Universities have some interest in micro-credentials both in terms of the potential to raise funding (in the context of decreased real Federal funding), and in terms of better meeting disciplinary and professional educational and training needs (part of their *raison d'etre*).

We strongly argue that in order to ensure quality, micro-credentials should wherever possible be tied to units in degree qualification programs, and we also recognize that there may be niche markets for which new units might be worh considering. There are three major approaches to consider here:

1. **Multiple-Unit Micro-credentials.** Existing units - usually stage 1 units - of an existing qualification may constitute a 'lesser' qualification, such that the HEP should be able to determine whether they grant Recognition of Prior Learning (RPL) credit toward a higher coursework qualification (= pathway programs). For example, with a Masters program (Level 9), there may be 'lesser' credentials (e.g., Graduate Diploma) whereby the HEP may choose to grant RPL for all or some of the Graduate Diploma units if the student wishes to enrol in the Masters program. This practice already exists throughout the sector. The advantages are (a) increased flexibility, and (b) that these units are identical to those units that have already been, and will continue to be, subject to quality assurance processes (e.g., TEQSA, APAC). The challenges are that it may be difficult (a) for students to acquire a coherent body of knowledge if, for example, the nature of the units change significantly over the years (while the student is likely undertaking the program part-time), and (b) to administratively 'keep count' of units taken.
2. **Part-unit micro-credentials**. The above advantages and challenges apply much more strongly to micro-credentials that involve dividing up the unit into smaller components

(e.g., a 6-UOC being divided into 3 smaller micro-credential 2-UOC 'sub'units). This approach would require not only careful design by the deliverers, but also close quality control by university program quality monitoring systems. The notion of 'badges' may apply well in the VET sector where specific skills need to be acquired (e.g., for chef training, being able to cook an omelette), but this does not apply well in many areas of the higher education sector (see 4.5 below).

3. **Employer or independent provider provision of short courses**. This kind of short course/program should not be the concern of the AQF. These are too difficult to quality-control, and the AQF Panel and TEQSA should engage in public education regarding the differences between AQF/TEQSA approved qualifications, and the many 'fly-by-night' operators who have little concern for quality.

The bottom line is that many will seek to financially profit out of micro-credentials, but QUALITY should be the paramount concern if Australia is to maintain its relatively high international reputation for quality education. The most expedient way to do this is to tie micro-credentials to existing units and programs that undergo quality assurance processes such as through the university Academic Board/Senate, TEQSA reviews, and professional accreditation bodies. Industry should certainly be involved in the design and delivery of micro-credentials relevant to professional education and training, but the educational institutions must take full responsibility for quality. That is, AQF/TEQSA should not concern itself with attempting to regulate stand-alone programs offered by industry.

It is recognised that some higher education Departments/Schools will seek to deliver the micro-credentials 'privately' and independently of the university administration (primarily for financial reasons). As long as it can be seen that these units are identical in learning outcomes/competencies to units in the parallel mainstream degree qualifications, then a strong case can be made for "recognition of prior learning" toward a full unit or degree program at the appropriate level.

For Australian psychology, the opportunity may be at the postgraduate level (level 9 and above); there has been a reduction in the number of non-clinical professional programs. A way forward to strengthen these areas of practice would be, for example, the APS Institute partnering with a Higher Education Provider (HEP) to create and offer units to provide that training, and also contribute to the APAC-accredited Level 9 (formerly called "bridging") programs from one professional specialisation to another, or from "generalist" to "specialist". This would be a positive for our profession as a whole. An additional need is specialist postgraduate units that 'bridge the gap' between our Level 9 qualifications and international qualifications which require extended expertise. In summary, these micro-credentials could best serve the profession of psychology in terms of 'extending and expanding' on solid professional training delivered by HEPs.

Finally, a point regarding recognition of prior learning from the VET sector, particularly in institutions that incorporate both VET and higher education provision. Some of our members have commented that granting VET students credit to transfer into higher education qualification/degree programs often presents challenges for those students due to the significantly differing contexts such as greater self-management and/or the rigour of intellectual demands required within the higher education sector. Not meeting these demands can and will lead to diminished academic results. It would be reasonable then to suggest that due to this, academic organisational unit leaders (such as Heads of Departments or Heads of Schools) may thus prefer not to give such recognition of prior learning. However, if there exists

institutional higher-level demands to meet a financial target of sorts, another concern is that it may ultimately put pressure on these leaders to continue to give this kind of recognition of prior learning, particularly if there are significant numbers of VET students seeking credit for transferring into higher education programs.

Possible approaches

- **Response 1:** Consider extending the upper levels of the AQF as indicated in the text above. This would solve the issues regarding diverse kinds of Masters and Doctorates.

- Include shorter form credentials in the AQF. **Response 2**: <u>Only</u> if these micro-credentials are components of higher education qualifications (as per 2013 AQF), and in particular, are either a ***multi-unit micro-credential*** (e.g., a Graduate Diploma program that is "stackable" to a Masters program) or a ***part-unit micro-credential*** that is "stackable" to the full unit. Moreover, it should be noted that significant operational/administrative/resource issues need to be resolved prior to implementing these micro-credentials. See above discussion. ***Universities Australia and the Group of Eight should lead the development of a FEASIBLE micro-credential system that emphasizes QUALITY.***

- Use the existing criteria for adding a qualification type to the AQF, possibly adapted for shorter form study, to determine whether shorter form credential types should be added to the AQF. **Response 3**: Only if meets the Response 1 conditions.

- Align shorter form credential types to AQF levels by assigning them across a number of applicable AQF levels. **Response 4**: Only if meets the Response 1 conditions.

- Determine what groupings of shorter form credentials are required, and create them as credential types in the AQF. **Response 5**: Only if meets the Response 1 conditions.

- To help to aggregate shorter form credentials into qualifications, create a shorter form credential type that is defined by its link to a qualification type. **Response 6**: Only if meets the Response 1 conditions.

4.2 The treatment of enterprise and social skills could be clarified in the AQF

From a psychology higher education program perspective, the first point to make is that prior to the Dawkins/Vanstone higher education reforms, there was more practical skill training in most undergraduate (Levels 7, 8) programs. Heads of Schools of Psychology (and likely other disciplines) cut this undergraduate skill training in tutorials/labs/practicals because their budgets were drastically cut, and because they needed to maintain such training in Level 8-10 postgraduate professional psychology programs. Thus, if the Australian Government wants more skill training and assessment in, for example, Level 7 and 8 qualifications/programs, then they need to provide the funding to adequately develop and assess such skills.

Some issues and suggestions:
- These "skills" seem simple on the surface (e.g., see Table 1, p.19), but when one begins to think about how to operationalise, develop and assess these skills, one starts to realise the many complexities.
- Even now, HEPs need to demonstrate that certain "enterprise and social skills" (Table

1, p.19) need to be in degree programs. How confident are HEPs that they can develop and assess these appropriately? APAC of course plays a strong quality assurance role. However, how well are HEPs, for example, developing and assessing "teamwork skills" and "cultural responsivity"?

- There are evidence-based (from psychological research) 'generic/transferable' skills/tools (e.g., in communication, team work, critical thinking) that could/should be developed and assessed (from basic to advanced) at various levels (e.g., 7). Psychology departments/schools should be doing this really well in Level 7 programs.
- In more specialised training contexts, for example, in postgraduate professional training (Level 8 and upwards), the degree of contextualisation and extension of these more generic skills need to be taken into account.
- The challenges in delivering this kind of skill training is obviously increased in fully online programs.
- Technological innovation is making the development and assessment of these skills much more economical, however greater and more effective use (e.g., coordination of evidence-based efforts) are required.

In the process of addressing these points/questions, *APS and the Heads of Departments and Schools of Psychology (HODSPA)* should *promote the potential contribution to this issue by educational and organisational psychologists*, given their skills in the operationalisation, development and assessment of competencies/learning outcomes.

> **Possible approach**
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> - Review the application of knowledge and skills domain of the AQF taxonomy and how it should be applied across the AQF levels. **Response 1:** Agree, but (a) in general, this process must be evidence-based, and ***organisational and educational psychologists*** can make a major contribution to this effort, and (b) professional organisations (e.g., APS), professional accreditation bodies (e.g., APAC) and the HEP peak disciplinary bodies (e.g., HODSPA) must be meaningfully consulted in this process.

4.3 AQF taxonomies and levels

> **Possible approaches**
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> - Response 1: See 4.1 Response 1 regarding extending the upper levels.
> - Revise descriptors to simplify them and ensure clear distinctions between levels. **Response 1:** Agree. However, *Universities Australia* and the *Group of Eight* must agree to the changes.

4.4 Senior secondary school certificates

> **Possible approaches**
>
> - 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. **Response 1:** Agree. However, *Universities Australia* and the *Group of Eight* must agree to the changes.

4.5 Volume of Learning

> **Possible approaches**
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> - To continue to provide guidance on the breadth and depth of a qualification, change the volume of learning unit of measurement from years to hours. **Response 1**. We ***STRONGLY DISAGREE*** with this approach. We see this as a case of micro-credentialling determining the parameters of the volume of learning against the well-established core business of substantive degree programs. AQF should continue to provide 'typical duration' guidance in terms of years, and as indicated in our response to 4.1, micro-credentials should be tied to existing unit/degree programs. It is the case that the VET sector (Levels 1-6) does not have 'volume of learning' guidelines, and there is good reason for this: these qualifications are usually based on highly specified technical skills, where there are well-established skill-assessment procedures, AND the methods of developing these skills are variable and thus perhaps not easily specified in terms of years or hours. That is, levels 1-6 qualifications are usually based on outputs – competencies – not inputs - volume of learning in this case (accreditation systems such as APAC also specify other inputs such as the qualifications of educators). The University qualifications (7-10) are not so easily reduceable to practical competencies, and even when they are, the cost of the development and assessment of these competencies is highly prohibitive (e.g., the development and assessment of competencies in Level 9 professional Masters Programs usually costs the

Department/School about $8,000 per year per FT students; this is usually funded by income from Level 7 undergraduate program, with the consequence that there is little appetite on the part of managers to develop and assess skill development at Level 7). In summary, "volume of learning" in terms of years is an imperfect but still valuable guide for the higher-level credentials, and the proposed shift to hours is counterproductive. Rather than waste resources on rejigging the nature of inputs from years to hours, spend those resources instead on creating reliable and valid ways to assess outputs (i.e., competencies).

- To provide a common baseline for volume of learning, base the number of hours for a qualification type on the needs of a new learner. **Response 2: Strongly disagree**. See Response 1.

- To help facilitate pathways between levels and qualifications, develop an hours-based credit point system in the AQF that may be voluntarily referenced by providers. **Response 3: Strongly disagree**. See Responses 1 and 2.

- To provide a common baseline for credit points, base the number of points for a qualification type on the needs of a new learner. **Response 4:** This depends on whether there is sector-wide agreement on how to operationalize what is meant by "new learner". Also, see Responses 1.

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5.1 AQF Policies

Possible approaches

- Revise the Pathways Policy as guidance, noting that primary responsibility for providing pathways sits with providers, training package developers and regulators **Response 1:** Agree. However, Universities Australia and the Group of Eight must agree to the changes.

- Develop a shared credit transfer register. **Response 1:** Agree. However, *Universities Australia* and the *Group of Eight* must agree to the changes, and should indeed *lead this initiative.*

5.2 Principles and Processes for the Alignment of the AQF with International Qualifications Frameworks

Possible approaches

- Remove from the AQF the Principles and Processes for the Alignment of the AQF with International Qualifications Frameworks and retain them as a Department of Education and Training Policy. **Response 1:** *Disagree*. The AQF should at least have some *Guidelines* for principles and process, such that the Framework is seen to be at least responsive to the global context.

5.3 AQF Explanations

"The AQF includes a number of written explanations on:

- credit (articulation, credit transfer, and RPL)

- the honours degree

- documentation

- clustered qualifications

- disciplines

- graduates

- proportion of components of a qualification at a level

- research

- volume of learning.

It may be more effective and transparent to include the information provided by the explanations in the relevant policies or other parts of the AQF. Alternatively, it may be of benefit to incorporate them in relevant guidelines published by ASQA, TEQSA or other regulators."

Response 1: The AQF should *retain this information* in a clear manner in the document, and of course, this should be consistent with other Government documents, and be agreed upon by peak bodies such as *Universities Australia* and the *Group of Eight*.