

Professor Peter Noonan
Chair, AQF Review Panel
Department of Education and Training

via: AQFReview@education.gov.au

13 March 2019

Dear Professor Noonan,

Re: Review of the Australian Qualifications Framework

The University of Canberra refers to the discussion paper on *Review of the Australian Qualifications Framework* and welcomes the opportunity to provide feedback.

Attached is our submission, outlining some of the concerns that the University would like to raise regarding the Australian Qualifications Framework.

Feedback from the University of Canberra can be summarised around five themes:

- Shorter form credentials
- Volume of learning
- AQF Levels
- Alignment of the Vocational Education and Training (VET) and Higher Education (HE) sectors
- Visibility to industry, employers and students

Please do not hesitate to contact Ms Fiona Sutherland, Fiona.Sutherland@canberra.edu.au should the expert panel wish to discuss further.

Kind regards



Professor Leigh Sullivan

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Review of the Australian Qualifications Framework

Submission by University of Canberra

March 2019

The University of Canberra refers to the discussion paper on *Review of the Australian Qualifications Framework* (AQF) and welcomes the opportunity to comment.

The University undertook internal workshops and consultations to gather a wide variety of views from academic and professional staff. Through course accreditation and review, a large number of University of Canberra staff have worked with the AQF.

Feedback from the University of Canberra can be summarised around five themes:

- Shorter form credentials
- Volume of learning
- AQF Levels
- Alignment of the Vocational Education and Training (VET) and Higher Education (HE) sectors
- Visibility to industry, employers and students

Our feedback is provided in response to the three questions outlined in the discussion paper.

In reviewing the AQF, the University of Canberra has adopted a student-centered perspective.

In relation to the matters under discussion, the three most important issues for students are mobility, shorter form credentials and international recognition.

The University acknowledges the excellent work done by the former AQF Council on qualifications recognition and strongly supports the need to now review the framework.

The University of Canberra

The University is incorporated under the *University of Canberra Act 1989* (ACT).

It is committed to serving the people of Canberra and the region through professional education and applied research.

The University of Canberra is ranked among top universities globally by both Times Higher Education (THE) and QS World University Rankings and appears in the 2019 THE rankings as one of the top 60 universities under the age of 50 years and one of the top 50 universities in the Asia-Pacific.

The University of Canberra's Strategic Plan 2018-2022, *Distinctive by Design*, provides an ambitious blueprint to position the organisation as a sector-leading university for the professions, guided by the principles of entrepreneurship, innovation, equity and diversity.

Feedback on the discussion paper

The following comments are provided in response to the questions asked in the discussion paper.

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

There are a number of ways in which the AQF is fit for purpose and able to achieve the goals set out in the January 2013 edition. The AQF accommodates *diversity* by encompassing the Higher Education, VET and Senior Secondary sectors through its breadth. It supports *pathways, lifelong learning* and *mobility* through facilitation of movement between qualification types and ease of credit transfer created by a shared understanding. It provides *quality assurance* through the ability to benchmark and map curriculum to knowledge, skills and application of knowledge and skills, and it provides room for innovation whilst providing quality oversight.

However, the University of Canberra also recognises that there are a number of ways in which the AQF is not fit for purpose and in need of improvement.

The volume of learning requirements, as currently framed, do not reflect contemporary modes of delivery, and are designed assuming secondary-school level knowledge of a discipline (as opposed to no exposure to a discipline). Nor is the AQF well understood outside of education institutions.

The focus of the AQF on full qualifications impedes the development and acceptance of just-in-need/time learning that can be credentialed – there is currently no explicit mechanism for the recognition of shorter form credentials. Whilst formal credit transfer between institutions is facilitated, recognition of prior learning, especially gained informally in the workplace, is more difficult.

Furthermore, the allocation of qualification types to levels presents some difficulties in implementing the AQF. Difficulties arise from the designation of qualitatively different types at the same level (particularly AQF level 8 containing honours, graduate certificates and graduate diplomas) and in the co-location of research and coursework degrees at the same level (principally level 9, but also level 10 with doctorate and professional doctorate awards).

Whilst the AQF's coverage of the Higher Education, VET and Senior Secondary sectors is a strength, the way this is achieved makes integration between these sectors more difficult. By creating a single qualification type descriptor and placing the burden of adaptation on each sector's regulator, the framework makes difficult the ability to create a single regulator in future (a proposal that has been floated by policy-makers in the past). This dual regulator approach can lead to outcomes where the same qualification type, seeking the same student outcomes, is approved through very different pathways.

2. Where it is not fit for purpose, what reforms should be made to the AQF and what are the most urgent priorities?

Reform 1: Integration of shorter form credentials

We recommend the framework be revised to recognise shorter form credentials. The University sees this as an urgent priority.

We do not, however, recommend the expansion of the qualification types to incorporate the (potentially) vast array of shorter form courses. Instead, it recommends the creation of a policy document that covers the relationship to qualification type descriptors, credentialing and quality assurance of shorter form courses, whilst embracing their current and future diversity.

Reform 2: Improve volume of learning

We recommend, also as a high priority, revising the qualification descriptors to give greater clarity to, and apply volume of learning.

Volume of learning requirements should be removed and replaced with an emphasis on authentic, quality assured and evidence-based application of student learning outcomes. Rather than evidence of length of study, the focus should be on how the student's experience, informal learning and formal learning (inside and outside the institution) combine to demonstrate how the student meets a course's learning outcomes, which are mapped at the appropriate standard to the qualification descriptors.

Failing this, the current years-based volume of learning statements should be replaced with a credit point system that facilitates comparability of units of study across institutions.

Reform 3: Sub-levels

Whilst acknowledging the inherent additional complexity involved in creating sub-levels (for example, level 8a and level 8b), the sub-division of certain levels could be further explored. This would allow qualification types to be qualitatively different, without creating the impression of a hierarchy or pathway between them, as could occur if a current level is split. The sub-level descriptors would maintain at least some similarity to illustrate their inclusion at the same level. One other advantage is that the qualification types would remain equivalent for policy items inside and outside the AQF that reference AQF levels (for example, the *Higher Education Threshold Standards* requirement that teachers hold an award at least one AQF level above that subjects they teach).

In particular, the University of Canberra recommends the current level 8 be split into level 8a (bachelor honours) and level 8b (graduate certificate and graduate diploma). These qualification types share characteristics of being post-bachelor, pre-masters/doctorate, and shorter (usually one year or less) yet are substantially different in focus (particularly as research versus coursework awards). Arguments about which of these qualifications should be listed at a 'higher' level than others are difficult to resolve.

The University would be comfortable with only one level sub-divided in this way, given the historic debates about and differentiation in qualification types at level 8, however recommends that consideration be given to applying this proposal to level 9 and level 10.

The University of Canberra considers this a high priority.

Reform 4: Assisting integration of the VET and HE sectors

Whilst the University does not state an opinion on the desirability or otherwise of further integration of the two sectors, and the various means by which that might be achieved, it sees value in conversations that ensures students are not biased against study options they consider to be in their best interest. This is particularly important in the context of recent calls for closer integration of higher education and vocational education.

Given that this AQF review is likely to establish a revised framework that will endure for some years, it is important that any revisions facilitate integration options, or at the very least, do not serve as an impediment. The University of Canberra recommends that the qualification specifications be re-drafted to support a closer alignment of the higher education and vocational education sectors. This is especially critical if the current system of certain qualification types traversing the two sectors is to continue. The re-drafting should consider how a common regulatory system and/or funding framework could be facilitated by the wording of the descriptors.

The University considers this to be a medium priority.

Additional feedback: Visibility to industry, employers and students

The University recognises that the current and previous AQF reviews engaged with industry, employers and students, and that TEQSA continues such engagement. Despite this, the University feels there is still a lack of visibility and understanding by these groups of the AQF and what it means for the credentialed learning of graduates/employees.

The University of Canberra recommends that TEQSA take advantage of the AQF review outcomes to initiate a deeper and enduring engagement with these stakeholder groups, aimed at expanding the understanding of the framework.

This University considers this to be a high priority.

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?

Reform 1: Integration of shorter form credentials

Ensuring that shorter form credentials mean something to both employers and students is the key implementation issue. Included in this are issues of definition of various credential types that create understanding and allow comparability across institutions. Credentials should cover a range of purposes such as employability and upskilling. The framework will need to demonstrate how such credentials relate to the AQF levels, for example, how much of the taxonomy is expected to be evidenced by the credential.

Reform 2: Improve volume of learning

The University acknowledges that removing volume of learning requirements and focusing on learning outcomes would be a significant cultural shift in the tertiary education sectors. It also recognises the difficulty of developing quality assurances processes robust enough to deter exploitation of this system. The University feels this reform is worth pursuing to provide flexibility for individual students in their studies, and to promote life-long learning.

Reform 3: Sub-levels

The main implementation issue is drafting the framework in a way that ensures no hierarchy between the qualification types, references their similarities whilst highlighting their significant differences. Additionally, policy items that reference AQF levels would need to consider that the qualification types would be equally valid.

Should the reform of sub-levels at AQF 8 be adopted, further consideration would need to be undertaken as to the value of the distinction between embedded and stand-alone honours awards.

Reform 4: Assisting integration of the VET and HE sectors

Writing a framework that takes into consideration two different cultures in the VET and HE sectors has obvious challenges. The University particularly raises the difficulty of incorporating the skills-based focus of VET at higher levels of the AQF. Consideration also needs to be heeded to the resourcing implications of any change, for example through expanding a skills-based focus into areas delivered by HE that traditionally have had a more theoretical focus.

Additional implementation issues

A long timeframe for implementation is required, especially if the changes would result in the need for all courses to be reviewed against a revised taxonomy. In the current, funding constrained environment, the cost of implementation by universities must also be identified and appropriate levels of financial support provided. Applying changes only to newly enrolled students from a certain date would limit both the time and cost of implementation.

Currently, a number of professional bodies allow entry to practice for graduates of courses at different AQF levels, most often both bachelor and masters courses. This creates a tension in which graduates of the two levels are required to meet the same professional standards but different academic standards (through the different AQF levels of the course). The University would appreciate guidance on this issue in any revised framework.