Ai GROUP SUBMISSION

Review of the Australian
Qualifications Framework

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About Australian Industry Group

The Australian Industry Group (Ai Group) is a peak industry association in Australia which along with its affiliates represents the interests of more than 60,000 businesses in an expanding range of sectors including: manufacturing; engineering; construction; automotive; food; transport; information technology; telecommunications; call centres; labour hire; printing; defence; mining equipment and supplies; airlines; and other industries. The businesses which we represent employ more than one million people. Ai Group members operate small, medium and large businesses across a range of industries. Ai Group is closely affiliated with more than 50 other employer groups in Australia alone and directly manages a number of those organisations.

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INTRODUCTION

The Australian Industry Group (Ai Group) recognises the fundamental role the Australian Qualifications Framework plays in Australia's education and training system. The Framework is of crucial importance in shaping qualification outcomes to build the best possible workforce for the economy. While underpinning education sector activity, it is equally important in its use as a tool by industry and individuals, making it a significant enabling component in the development and improvement of our nation's knowledge and social capital.

A Review of the AQF's relevance is therefore welcomed. The Review is needed to ensure the AQF provides a suitable framework that facilitates Australian industry as it experiences accelerating change in a digitalised economy; as education and training sectors innovate in the development of knowledge and skills; and as individuals increasingly up-skill and re-skill throughout their lives. The Review will bring the Framework in line with new and contemporary international qualification frameworks with features that best assist the development and continuous skilling of workforces in other countries.

The renewal of the AQF also provides an opportunity to encourage pathways and provide a solid underpinning for a more coherent and equitable tertiary education sector in Australia.

RESPONSE TO THE AQF EXPERT PANEL'S THREE BROAD QUESTIONS

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

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

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?

Ai Group agrees that the contextual issues considered within the Expert Panel's Discussion Paper capture the main challenges impacting the effectiveness of the AQF. These issues drive the need for new features to be introduced along with adjustments to be made. However, Ai Group believes that the structure of the Framework is in large part fit for purpose. Areas that need to be addressed, particularly from the perspective of industry, in order of priority include:

1. Ensuring shorter form education and training can be recognised
2. Explicitly including enterprise skills
3. Developing appropriate level descriptors and taxonomy
4. Addressing anomalies through volume of learning changes and credit points
5. Promoting multiple pathways by recognising the SSCE incorporates a range of levels.

Ai Group believes the following reforms should be made with regard to areas of the AQF listed above that are considered not fit for purpose. These areas are addressed in order of priority, with perceived implementation issues also discussed.

1. Ensuring shorter form education and training can be recognised

Higher level technologies are impacting all industries resulting in continuing demand by employers for new entrants with relevant qualifications at all levels in a range of vocations and disciplines. However, in addition to this, quickly evolving roles and tasks mean industry is demanding short forms of training to rapidly up-skill and re-skill existing workers, supplementing their existing qualifications. Ai Group has evidenced the increasing use of specific vocational skill sets by industry, as well as the take up of short, non-accredited programs/micro-credentials offered by universities or other providers. Similarly, individuals are undertaking shorter forms of training as they perceive that additional knowledge/skills will provide them with advantages in the labour market.

Ai Group believes both of these stakeholder groups would benefit from the recognition of shorter form credentials within the AQF. These practices by industry and individuals will only increase over time. Recognising these credential types will be crucial moving forward in demonstrating to employers the specific sets of knowledge and skills an individual is capable of, indicating potential performance and ongoing learning ability.

The most crucial design consideration for shorter form credentials involves quality assurance. As discussed in the Discussion Paper for the Review, there are many types of shorter form credentials. In reviewing the resumes of potential new employees, or providing training for existing employees, an employer will be assisted by quality assured mechanisms and records of shorter form credentials that identify appropriate levels of knowledge and skills.

Ai Group supports the inclusion of shorter form credentials within the AQF where they meet the current seven requirements for a qualification type to be listed in the AQF. This would mean that some existing forms of shorter form credentials would not be included in the Framework.

Ai Group also supports the introduction of shorter credentials to the AQF via multi-level, broad-banding features, similar to frameworks that have been adopted by the Scottish and Irish systems. The indicative model presented by the AQF Panel during consultations which enlarges the AQF horizontally is considered to be a solid starting point for design.

2. Explicitly including enterprise skills

Ai Group research into employers' workforce development needs over recent years has found an increasing importance being placed on enterprise skills in the workforce.[1] The reasons for this have been well documented and include the increasing pace of change in industry, changing roles and tasks, increasing autonomy in roles, and work performed alongside new technologies. While employers need individuals to have these enterprise-based skills to adapt quickly and be able to make decisions in uncertain situations, the skills are grounded by

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[1] Ai Group Workforce Development Needs Surveys, 2014, 2016, 2018

specific qualifications/discipline areas. Employers want to know that graduates of both VET and higher education qualifications hold good enterprise skills. Capabilities in problem solving, critical enquiry and creativity are needed by all levels of the workforce however they can only be developed within context and employers expect this to have occurred as part of their education and training.

Employers need to be assured the development of enterprise skills occurs within learning and teaching; that these skills have been acquired and assessed. Connections between the education and training sectors and industry are increasing as each sector recognises work integrated learning and work-based learning approaches assist in the development of enterprise skills through workplace experiences. These initiatives relate to the quality and relevance of qualifications but do not point to the need for enterprise skills to be included within the AQF taxonomy.

Ai Group therefore supports the suggested approach that limits the Review to expanding the list of generic learning outcomes to incorporate current enterprise and social skills and to providing advice on delivering them through various qualifications.

3. Developing appropriate level descriptors and taxonomy

A revision of the descriptors within the Framework to remove duplication in both levels and qualification types is a sensible reform that will provide clarity for a number of stakeholders.

Ai Group also strongly supports work that revises the AQF to recognise the application of knowledge and skills does not necessarily increase in complexity with the level of knowledge and skills. Industry is well aware that individuals at lower qualification levels can operate with higher levels of responsibility and autonomy than people with high level qualifications, depending on the role or context.

The concerns of stakeholders raised in the Discussion Paper in relation to perceived hierarchical values applied to VET versus higher education qualifications are shared by Ai Group. However, it is agreed the reason for these perceptions are complex and not able to be changed entirely by a renewed Framework. If the work described above introduces an accurate reflection of levels of responsibility and autonomy in the knowledge and skills domain of the AQF taxonomy it will become one enabler to more equitable perceptions of qualifications in the different sectors.

Consultation during this work should take into account implementation issues concerning unintended implications on industrial award classifications given potential changes to autonomy and responsibility levels. Ai Group and employers, along with unions, are regularly involved with industrial award classifications and activity that utilise AQF levels and qualifications descriptors. Even small changes potentially have consequences for Modern Award rates and the Review's recommendations and subsequent work must be sensitive to this.

4. Addressing anomalies through volume of learning changes and credit points

Ai Group supports the retention of volume of learning descriptors for qualification types. Whilst not perfect these descriptors are a reasonable indicator of the complexity of each type. It is also important that this descriptor encourages consistency within qualification types and discourages the examples of inconsistency that currently exist between the same VET qualification types in different industry sectors. Furthermore, removal of volume of learning measures altogether would almost certainly give rise to adverse consequences, detrimental to the standing of various qualifications and their respective sectors.

However volume of learning should be regarded as a notional duration descriptor that guides delivery arrangements, at the same time recognising the focus is on the achievement of learning outcomes through the process.

It is acknowledged that modes of delivery and methods of learning are increasingly flexible which complicates the review of a volume of learning descriptor, however Ai Group supports a renewed descriptor that incorporates the following:

- the use of hours rather than years
- applies to new learners (in order that achievement over reduced time periods is acknowledged as prior learning/experience)
- considers how self-managed learning and guided learning is assessed.

Ai Group sees greater facilitation of pathways between levels and qualifications as an important aspect of a renewed qualifications framework in Australia. Potentially achieved through a credit point system, the benefits listed in the Expert Panel's Discussion Paper would support contemporary business through:

- simplifying comparison of learning outcomes
- facilitating recognition of shorter form qualifications
- expressing equal importance of both VET and higher education
- allowing easier comparison with international qualifications.

Therefore, Ai Group supports the revision of the Pathways Policy, the development of a voluntary hours-based credit point system, and the development of a shared credit transfer register.

5. Promoting multiple pathways by recognising the SSCE incorporates a range of levels

The continued inclusion of the Senior Secondary Certificate of Education within the AQF but not aligned to an AQF level is supported because it is clear that it cannot neatly align to a single level.

However revision and expansion of the SSCE descriptor, as suggested by the Review Panel, to incorporate high-level learning outcomes as well as the range of pathways it creates is strongly supported. This will more clearly articulate to students and employers the pathway options of employment as well as VET and higher education qualifications, resulting in individuals best suited to their chosen pathways and best utilising their acquired skills and knowledge.

The completion of different level VET certificates in the SSCE through VET in Schools programs is a valuable transition mechanism for young people to the world of work. This is becoming increasingly important as workplace environments change at an accelerating rate and exposure to work while at school is an advantage.

Further, by more clearly outlining approaches to credit into VET and higher education, the SSCE descriptor could facilitate the gaining of credit for particular subjects or programs.

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