

SUBMISSION TO THE REVIEW OF THE AUSTRALIAN QUALIFICATIONS FRAMEWORK

15 March 2019

Universities Australia (UA) welcomes the opportunity to make a submission in response to the discussion paper on the Review of the Australian Qualifications Framework (AQF).

The AQF plays an important role in assuring students, employers and other stakeholders of the level, content and quality of qualifications at all levels of the Australian education and training system. This includes diplomas, certificates and degrees awarded by universities. It also provides valuable information and assurance in international study and employment markets.

The AQF is a useful guide to qualifications that sets out basic parameters for providers, students, employers and other stakeholders.

The AQF also plays an important part in higher education regulation. The Higher Education Threshold Standards include a requirement that the learning outcomes of all higher education qualifications must be consistent with the AQF level of the course. Due to the AQF's regulatory role, it is particularly important to avoid changes which may unintentionally restrict or hamper universities' responsiveness to changes in demand and changes in educational practice.

UA considers that the AQF is basically sound. We do not see a need for radical change to taxonomy (for example, changes to the number of levels or the addition of major new qualification types). We would not support major changes to the structure or contents of the framework.

This submission considers four of the five key areas canvassed in the discussion paper, namely:

- Short courses
- Descriptors
- Social and enterprise skills
- Volume of learning

UA welcomes the Review's discussion of senior secondary school qualifications, but we do not have a particular view on the issues canvassed in the paper. UA is happy with the AQF's current treatment of senior secondary certificates, though we would not oppose changes that might better recognise the diversity of purposes that these qualifications serve.

SHORT COURSES

The discussion paper considers the desirability of integrating qualifications into the AQF, especially short courses. For universities, the main question here is about short form courses such as micro-credentials. Issues raised in the paper about foundation and Enabling courses are also relevant to universities.

UA welcomes the Review's recognition of the growing importance of and demand for micro-credentials and the increasing supply of a diverse range of courses by universities. Micro-credentials are an exciting example of innovation in the university sector. Universities are developing a wide range of new courses to respond to the rapidly changing and diversifying needs of both students and employers.

By definition, this is a fast-moving area characterised by experiment and innovation. Micro-credentials are very diverse. It is hard to see how a document like the AQF could develop a definition that would cover all (or enough) of the range of courses that are offered, to say nothing of new courses that will be offered in the future. UA is concerned that adding micro-credentials to the AQF may inhibit innovation and responsiveness, or it may simply fail to keep up with developments in the market.

On the other hand, changes to the AQF could stop well short of setting up new levels or qualification types but could provide clearer and more transparent pathways and credit recognition for short courses. UA considers that this merits closer examination. Even here, though, we would acknowledge the difficulty of capturing the range of courses on offer. We would question whether it is likely to prove worthwhile to attempt to do so: is there currently a significant problem in recognition of study of micro-credentials for the purpose of admission to other higher education awards?

As a matter of general principle, UA advises against seeking to develop one size fits all arrangements for credit recognition. In the case of micro-credentials, there are also specific reasons to avoid an overly prescriptive approach. As stated, micro-credentials are diverse and are changing rapidly. Even more than with current AQF courses, recognition of prior learning is a matter on which there is no substitute for the informed academic judgement that universities exercise on the ground.

On Foundation and Enabling courses, UA is not sure there is a case for converting these non-award programs into AQF qualifications. Again, the real issue is credit recognition and access to other courses (especially at level 7). Again, we consider the first question to be whether there is currently a problem.

DESCRIPTORS

UA does not see any need for wholesale changes to AQF taxonomy. However, we do support in principle the discussion paper's proposals to revise descriptors in order to make them clearer and to reduce duplication. This would make the AQF easier to understand and interpret. Resolving apparent confusion between descriptors of levels and qualifications would make the framework conceptually tidier and more straightforward to use.

UA supports the intent expressed in the discussion paper to better recognise the value of both VET and higher education. UA is not necessarily equipped to suggest detailed solutions for VET-level qualifications in the AQF, however, we suggest it would be reasonable and effective to work on descriptors of VET qualifications to better reflect their level of autonomy and responsibility.

SOCIAL AND ENTERPRISE SKILLS

The discussion paper addresses some big questions about not just the AQF but about the nature of formal education in its discussion of social and enterprise skills. UA opposes changes to how social and enterprise skills sit in the framework. There is no way of reliably and consistently relating social and enterprise skills to different levels and qualifications.

UA considers that a valuable change to this part of the AQF would be to update current provisions relating to generic skills. This would likely involve expanding the range of skills included, in addition to updating to match contemporary conditions and expectations.

UA strongly agrees that the AQF should specify that social and enterprise skills should be:

- taught in the context of the qualification's core content;
- acquired through the process of teaching and learning; and
- assessed and reported in ways that are fair, valid and reliable.

VOLUME OF LEARNING

UA agrees that retaining typical volume of learning in the AQF is necessary. Specifying a typical volume of learning for each qualification is an important guide for students and employers, and for regulators.

Nevertheless, typical volume of learning is – as the wording makes clear – only a guide and not a rule or a requirement. A qualification meets the requirements of the AQF through satisfying the learning outcomes that the framework sets out. A qualification can deliver the required learning outcomes in a shorter (or indeed a longer) time than the typical volume of learning

Specifying volume of learning in ‘years’ works reasonably well in higher education. UA recognises that this may be less so in other sectors.

UA has some concerns about the proposal in the discussion paper to replace years with hours. We are concerned that a volume of learning expressed in hours would tend to be interpreted in a more prescriptive way, simply because it is a smaller and more detailed unit of measurement. A possible solution could be to express volume of learning for each qualification in both hours and in years/months, with the volume of learning in each classification notionally equivalent to the other. In such a system it may be useful to express volume (especially volume in hours) as a range. Such an approach to volume of learning would be more flexible and would take better account of legitimate variation (and innovation) in educational practice. It would also make it clearer to the various users of the AQF that typical volume of learning is a notional, typical value, rather than a regulatory requirement.

UA does not support the proposal in the discussion paper that volume of learning be augmented by a credit points system. We do not see a good reason to duplicate volume of learning expressed in units of time.

More substantively, UA is wary about proposals for credit recognition and recognition of prior learning that appear prescriptive, as a credit points system necessarily does. It would not be appropriate or helpful to adopt a system that purported to reduce the proper role of informed academic judgement in credit recognition and admissions. This would tend to be damaging to the quality and reputation of Australian higher education. More importantly, it has the potential to mislead students and set them up for failure.

Recommendations

UA recommends that the Panel:

- Advise against major changes to AQF taxonomy;
- Advise against adding micro-credentials and other short courses to the AQF as separate levels of qualification types;
- Consider whether it is necessary to amend the AQF to better recognise study in micro-credentials, short courses, foundation and Enabling courses for the purposes of credit recognition;
- Revise descriptors to make them clearer and reduce duplication;
- Revise descriptors of VET qualifications to better and more accurately recognise the level of autonomy and responsibility;
- Advise against adding social and enterprise skills outcomes to AQF levels;
- Update and expand existing AQF provisions on generic skills;
- Retain typical volume of learning;
- Consider expressing typical volume of learning in both hours and years/months
- Advise against adopting a credit point system of credit recognition.