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

Rob Thomason, Executive Director, VETASSESS

Respondent organisation (where relevant)

VETASSESS is a leading provider in Australia for skills assessments, resource development and testing services. In the context of Australia's skilled migration program, VETASSESS is a gazetted skills assessing authority for over 240 professional occupations on Australia's skilled occupation lists. VETASSESS is also an assessment-only Registered Training Organisation (RTO) and conducts trade skills assessments in 16 countries and in more than 26 different trade occupations on behalf of Trades Recognition Australia (TRA).

We welcome the opportunity to participate in the Australian Government's Australian Qualifications Framework review led by the AQF Review Panel.

As the largest skills assessing body supporting the migration program VETASSESS brings the dimension of immigration to the AQF discussion in light of the increasing numbers of **i)** international students entering the Australian education system as well as **ii)** migrants with foreign qualifications participating in Australia's workforce.

VETASSESS shares its insights and views in response to the three broad questions identified by the AQF Review Panel, on the merit of its experience and expertise built through assessing more than 150,000 overseas and Australian qualifications in consideration to the AQF.

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

AQF Fit for Purpose

VETASSESS endorses a qualification framework, which is internationally recognised, quality assured and provides recognition of qualifications to support lifelong learning in a global context. For the skilled migration assessment (associate and professional occupations), VETASSESS uses the AQF for comparison of overseas post-secondary qualifications held by the applicants. We refer to the AQF descriptors to determine the educational level and expected learning outcome of the overseas qualification for comparison to the most suitable fit on the AQF.

VETASSESS finds the Second Edition of the AQF (January 2013) to be a very substantial document that provides comprehensive descriptions for each AQF Level. We find that the current AQF (Levels 1 to 10) provides a solid framework for comparing overseas qualifications, covering qualifications from all education sectors from vocational education and training to higher education. For many countries in South America, Middle East and the Subcontinent, the information concerning AQF Qualification Type serves as a useful assessment tool for the assessment of overseas qualifications where national credit point systems in these respective countries do not exist.

AQF Not Fit for Purpose

1.Volume of Learning

For VETASSESS, one of the main impediments to overseas qualification recognition is the measure of the 'volume of learning' for AQF qualifications that reside on the same AQF Level. Whilst the Bachelor Honours Degree, Graduate Certificate and Graduate Diploma are benchmarked at the same AQF

Level 8, they can vary considerably in duration, which can be problematic for the assessment of the overseas qualifications. In our view, the AQF qualification descriptors lack definitive information regarding the minimum volume of learning expected to achieve a given AQF qualification. Rather, the AQF descriptors are generic in this regard in providing a range within a certain timeframe rather than a specific duration for the full-time courses.

For example, according to the AQF descriptor for a Graduate Certificate, the volume of learning ranges from 0.5 to 1 year. This flexibility raises doubt about the depth and complexity of competencies acquired by individuals to work in their nominated occupation when assessing their subsequent employment for migration purposes.

The situation is more problematic with the assessment of the overseas technical and vocational sector qualifications. For example, the volume of learning listed in the AQF descriptor for the AQF Certificate IV generally ranges from 0.5 to 2 years and this raises the question as to whether one semester of full time study is set as the minimum requirement for the volume of learning requirements.

VETASSESS acknowledges that its approach and use of the AQF model is unique to its work, i.e. it uses the AQF as a tool in the assessment of overseas qualifications for skilled migration purposes. However, VETASSESS also recognises that qualifications may bear the same name in other countries with varying volume of learning requirements. We therefore support the notion that a clearer definition of volume of learning requirements will provide a more easily understood system regarding the depth and breadth of study required for individual AQF qualifications. In terms of global mobility, overseas-qualified professionals or international students entering the Australian tertiary education sector will also benefit from having a clearer understanding of pathways available to post overseas certification or studies that may count as prior learning.

2.Taxonomy - AQF Levels 7 and 8

The 2018 Phillips KPA's report on Contextual Research for the Australian Qualifications Framework

Review[1] notes that the AQF Level 8 incorporates the Bachelor Honours Degree, Graduate Certificate and Graduate Diploma although these qualifications are different in terms of design, volume of learning and learning outcome purposes. It says that the differences in these qualifications are not reflected in the AQF descriptors.

To contextualise the above statement, the AQF descriptors do not distinguish between the complexity and volume of learning covered in a Bachelor degree program as opposed to that in a Graduate Diploma level program. The question is often asked by overseas-qualified professionals, "Can the holder of a Graduate Certificate or Diploma be deemed to have a qualification that should be considered higher than a Bachelor Degree?" This problem arises when the assessment criteria for an occupation specifies the requirement of a qualification 'equivalent to or above the level of Bachelor Degree', such as the higher education Graduate Certificate/Diploma that are graduate qualifications above the Bachelor Degree on the AQF. In such cases, VETASSESS supports the distinction that Graduate Certificate/Diploma awards have a more selective purpose than the Bachelor degree, and therefore they do not have the comprehensive coverage of the academic discipline base characteristic of the Bachelor Degree.

3. Misinterpreted Hierarchy of the AQF

According to the 2018 Discussion Paper on the "Review of the Australian Qualifications Framework", there is the common view of the AQF as a "ladder", with VET qualifications at the bottom and higher education qualifications at the top. VETASSESS supports the need to place greater emphasis on qualification descriptors as opposed to increasing complexity of levels in order to dissipate public misconception on the values of pursuing vocational and higher education learning.

4. National Credit Point System

The assessment of overseas qualifications to an appropriate educational level of the AQF can be difficult due to the differences between overseas qualification frameworks and discrepancies between the assessment standards of assessing authorities. It is unlikely that there will be an exact correlation between the AQF and overseas qualifications frameworks due to many variables across the globe but VETASSESS supports the need for the inclusion of a national credit point system to provide a more uniform and easily understood system to that which currently exists.

Currently, there is no unified credit points system for Australian universities and no credit point system for the VET sector. Australian universities calculate the credits according to the workload and number of study hours per course and these vary considerably at the discretion of the education provider. Hence, the current system does not allow for studies within the VET sector to be easily translated into higher education learning.

The non-existence of a credit point system in the VET sector, which is solely based on outcomes of 'competent' or 'not yet competent', further adds to a system that does not support the transferability and application of knowledge and skills achieved in a range of contexts.

5. Inclusion of Micro-Credentials linked to Industry Engagement

According to recent reports, including the 'Review of the AQF Discussion Paper 2018' and Phillips KPA's 2018 report[1], it has been widely recognised that the acceptance of short duration and micro-credentials on the AQF will likely benefit the industry sector. Particularly, this proposal will address industry needs for the acquisition of job readiness skills by recent graduates as well as the upskilling of the existing workforce through shorter duration and lower priced courses.

As seen for qualifications obtained in Europe and South America, VETASSESS finds that it is common practice for students to undertake vocational or professional programs after graduation to enhance their employment prospects. These programs can vary considerably according to the industry of engagement, program duration and learning level. The courses may range from practical-oriented vocational learning to specialised knowledge acquisition for postgraduate level study.

VETASSESS is of the opinion that the AQF cannot afford to be lagging with the absence of an accreditation system for short professional qualifications offered nationally when compared to countries such as the United Kingdom, Ireland, South Africa and New Zealand who have integrated these qualification types into their national qualification frameworks through regulated and quality assurance systems. Examples include the UK Ofqual Register (Office of the Qualifications and Examinations Regulator) and QQI (Quality and Qualifications Ireland Register). VETASSESS supports the need to include recognition of these qualifications to accommodate the different purposes and reasons why individuals choose to obtain these and seek recognition.

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.

For the following proposals, the most urgent priorities will depend on resources available to the Department.

1.Volume of Learning

Clearer definition of volume of learning requirements will provide a more easily understood system regarding the depth and breadth of study required for individual AQF qualifications. To enhance global mobility, the AQF needs to provide qualification descriptors that are easily understood internationally. For the international student, the descriptors need to better reflect the intended level of learning in order to provide the student with a better idea of where their qualification may align with the AQF.

2.Taxonomy - AQF Levels 7 and 8

Clearer AQF Levels 7 and 8 descriptors should aim to address the difference in award nature and the respective pathways of these qualifications.

3.Misinterpreted Hierarchy of the AQF

As covered in the "Review of the Australian Qualifications Framework" Discussion Paper, Dec 2019, many people think of the AQF as a ladder, with VET qualifications at the bottom and higher education qualifications at the top.
Because the focus of the AQF model is primarily on the regulation rather than its implications in the practical use by the public audience, an emphasis on qualification descriptors as opposed to increasing complexity of levels will assist in overcoming this perception.

4.National Credit Point System

International students are significant users of the Australian education system and it is important to factor in comparability/transferability from overseas qualifications into the AQF system. A well-defined national credit points system that is fit-for-purpose and recognises varied entry pathways will provide a more transparent system across all learning sectors in Australia, and minimise barriers when benchmarking an overseas qualification to its most appropriate level on the AQF. This will also provide clearer, more objective articulation pathways within and between higher education and the technical and vocational sectors.

5.Inclusion of Micro-Credentials linked to Industry Engagement

VETASSESS predominantly assesses overseas academic qualifications for skilled migration purposes. Hence, the volume of Australian qualifications assessed is low in number. To date, the submission of

an Australian 'micro-credential' for assessment has been relatively small. For the period 01/2018 to 01/2019, a total of 6,525 entries were recorded on our database system as submitted Australian qualifications. Out of this total, less than 70 entries would fall into the category of 'short duration studies or micro-credentials'.

Based on VETASSESS data analytics, we concur with Phillips KPA's research and feedback[1] from industry groups that there is a need for job readiness skills and specialised knowledge in the current workplace. Interestingly, most holders of micro-credentials also hold university level qualifications obtained from both overseas and Australia as demonstrated in the following VETASSESS case studies:

Case Study Applicant 1
Nominated profession: Clinical Coder (ANZSCO Code 599915)

Applicant's qualifications	• Certificate of Achievement awarded in 2017 by the Health Informati Management Association Australia • Completion of two competencies - Introductory and Intermediate ICD-10-/ ACHI and ACS Clinical Course Duration: 270 notional hours Coding • Additional Previous Qualification: Bachelor of Science in Nursing (2009) from an accredited university in India

Case Study Applicant 2
Nominated profession: University Lecturer (ANZSCO Code 242111)

Applicant's qualifications	• Certificate of Completion awarded in 2016 by the University of Western Australia • Completion of unit 'Transforming Teaching for Learning' Course Duration: 150 hours minimum • Additional Qualifications: Bachelor of Dentistry (1998) from an accredited university in Syria and doctorate (2006) from an accredited UK university

Case Study Applicant 3
Nominated profession: Café and Restaurant Manager (ANZSCO Code 293105)

Applicant's qualifications	• Completion of Fremantle Barista - Accredited Barista Training awarded in 2016 by Franklin Scholar • Completion of competency - Provide Responsible Service of Alcohol awarded in 2014 by EOT.edu.au

| | Course Duration: 1 week and online respectively |
| | • Additional Qualification: Bachelor of Education (2013) from university in Nepal |

In the above examples, all applicants received a successful skills assessment outcome based on the relevant qualification and employment history in their nominated occupation. While the short duration/micro-credentials were not included in the assessment result, they served as positive indicators in relation to the intended learning outcomes of these studies towards the industry sector.

For the AQF to be flexible and support global mobility there will need to be a robust governance structure to include active industry participation to reflect current educational needs and skills required for today's dynamic workforce. An overseas example of industry involvement in education is the Maori Tertiary Education Framework, New Zealand, where industry and businesses establish links with Maori communities, and tertiary education providers for the purpose of regional economic development.

If the AQF Review Panel were to consider including micro-credentials within the AQF it may be worth considering a more streamlined approach to recognising micro-credentials on their own as opposed to pegging against each of the AQF levels. VETASSESS proposes micro-credential accreditation based on baseline descriptors involving learning content and outcomes tailored for trades, associate professionals and professionals working in their respective industries.

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.

National Credit Point System

VETASSESS is of the view that the introduction of a national credit point system will enable the assessment of overseas qualifications for comparison to the AQF and will be less problematic when determining the volume of learning involved in a study program, particularly within the Australian VET sector that does not yet include a credit point system.

Timeframe for Inclusion of Accredited Short Duration, Micro-Credentials

VETASSESS' current skills assessment process does not include consideration of an incomplete, non-accredited short course qualification or unregulated micro-credential. Our concern would be the timeframe needed for the implementation and alignment of accredited short course and micro-credentials to the AQF, including quality assurance measures for these courses.

To this end, VETASSESS supports the possible development and implementation of 'blockchain' data banks to record credits attained and support the validity and acceptance of shorter form qualifications such as micro-credentials.

Social and enterprise skills

VETASSESS supports the view that soft skills are crucial to the successful application of qualifications in the workforce. As a short-term strategy, it would make sense to enforce or at least encourage VET/higher education providers to provide a learning pathway for credential learners to exit with soft skills certification as part of their study program. As a long-term strategy, VETASSESS supports the need to streamline regulation across the higher education and VET sectors and lay the foundations for soft skills within the school curriculum carried over by the VET/higher education providers, thus further solidifying these skills to create a job-ready workforce.

Other

VETASSSESS supports the need for a qualifications framework for employers to be able to re-train and upskill its their existing workforce. This will provide validation for learners seeking acknowledgement of their learning, i.e. credits towards their future further learning.

The framework should be aimed at addressing the local and international needs of learners, i.e. establishing clear career pathways to support the Australian workforce development.

Given the low level of confidence by the VET sectors in using AQF descriptors, VETASSESS supports the need for better integration of the VET and higher education qualifications within one qualifications framework.

That said, while employment prospects is the main driving force for the current AQF model, there also needs to be consideration to those individuals who have interest in expanding their work and life skills as these factors will determine the learning pathways to choose.

Resources used:
Australian Qualifications Framework: https://www.aqf.edu.au
Australian Government State and Territory Governments – https://training.gov.au
Study in Australia:
https://www.studyinaustralia.gov.au/english/australian-education/education-system/course-credits
[1] Contextual Research for the Australian Qualifications Framework Review 2018:
https://docs.education.gov.au/system/files/doc/other/aqf_contextual_research_0.pdf