



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

Professor Greg Hill, Vice-Chancellor and President

Respondent organisation (where relevant)

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

The Australian Qualifications Framework (AQF) has served the Australian education sector well since the first AQF Implementation Handbook in 1995. The AQF has shown itself to be a framework capable of change and adaptation when necessary during various reviews since that time, although no major structural changes have been identified as needed during such reviews. While the current review has placed a number of issues forward for consideration, it is the view of USC that major changes to the AQF are not required.

The current structure is vital and useful in ensuring that the educational requirements for different levels of qualifications are the same across all providers issuing those qualifications. It also allows employers to understand what can be expected from a graduate of a particular AQF level. For employers, education institutions and governments, it provides a means for comparison of international qualification types which is vital in the global economy of student and graduate mobility.

Perhaps the major problem with the AQF is the hierarchical presentation of the qualifications that can lead to assumptions about the 'value' of the various levels. There can be a view that higher education qualifications are better or more important than VET qualifications because they are at

a higher level. The AQF does not always reflect the reality of the teaching and demonstrated knowledge required in achieving some qualifications and what the outcomes of obtaining them are. This is best reflected in the VET sector where several Certificate III and Certificate IV qualifications graduates are required to be registered and licensed by State authorities for employment purposes due to public safety needs. Graduates of these programs would seem to need to demonstrate vastly more skills than others who achieve similar level certification

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.

Level 8 of the AQF is problematic in respect of the study required to achieve this level qualification. The work needed to achieve an add on honours qualification is generally quite substantial coursework and a thesis, while the work required for a graduate certificate or graduate diploma might not necessarily be as complex. Some further description about the difference in qualifications at this level with regard to skills, knowledge and outcomes could assist with clarification. This description should also include information on embedded honours.

Simplification of the AQF would ensure that it is more user friendly. This simplification could be achieved by removing duplication of information in descriptors. USC supports the proposal to describe the AQF levels in terms of knowledge, skills and application of knowledge and skills. The proposal to include enterprise and social skills within the framework is not supported. Some of these skills cannot necessarily be taught – empathy, resilience. While technical skills are in the current framework, it would be appropriate to embed digital skills and literacy as a fundamental requirement for all levels.

Volume of learning has been a contentious part of the AQF for some time but has remained in place as a means of ensuring all programs provide appropriate educational outcomes for students. With the variation in mode of study now available, volume of learning might be better expressed in hours rather than duration. Anecdotal evidence suggests that students tend to ask how many hours they will need to dedicate to their study. Hours of study could include indicative learning hours, with learning hours defined for those new to the discipline of study and for those with previous knowledge.

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.

The AQF has always been resilient in dealing with new credentials and they are nothing new. The issue of including industry credentials in the AQF was considered by the AQF Advisory Board in 2002. The decision not to do this at the time did not harm the AQF and did not prevent industries from continuing to develop, deliver and recognise their own qualifications.

Many of the micro-credentials offered are industry specific, used for career advancement and well recognised within the particular industry, and often beyond. There is no apparent need for the AQF to include these. Where shorter courses are offered by higher education providers, these can be designed to fit in with existing courses and programs to allow for transition to further study if desired. Participants could also be informed that if they completed certain clusters of such courses they might be eligible for an existing qualification.

New forms of credentialing will continue to develop and the AQF cannot continually be reviewed in order to consider recognition of these within its structure. Institutions can develop their own mechanisms for recognition through credit and RPL policies and procedures. If there are any problems because of this approach, then regulators can identify these during re-registration processes and ask for appropriate changes to be made.

The AQF Pathways Policy could be removed as it has been superseded. The creation of a Pathways Guideline could however be of value. The focus of these guidelines could assist with enabling movement between the AQF levels. The AQF is currently largely seen as a one-way framework – that is up. With the growing need by employers for practical, hands on skills, many graduates would like to enter VET programs to complement their university achievements and give them more options for entering the workplace. Guidelines would also allow for more information to be available to high school students on their options for completing VET in Schools, of completing pre-university study at school, and where these could lead them.

While the proposal for a National credit transfer register sounds attractive, it is too difficult to develop and implement. Similar proposals and projects have been tried before in a number of formats and have never been successful despite a lot of work and resourcing going into some of them.

Other

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