CHARLES STURT UNIVERSITY

Submission

Australian Qualifications Framework Review Panel

Australian Government

Review of the Australian Qualifications Framework

15 March 2019

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15 March 2019

Professor Peter Noonan
Chair
Australian Quality Framework Review Panel
Department of Education and Training
50 Marcus Clarke Street
CANBERRA ACT 2600

Dear Professor Noonan

AUSTRALIAN QUALIFICATIONS FRAMEWORK REVIEW

On behalf of Charles Sturt University, I am pleased to provide this submission to the Australian Qualifications Framework Review Panel as part of the Panel's review of the Australian Qualifications Framework (AQF) deliberations.

Charles Sturt University believes that the AQF is fit for purpose, not only for today's tertiary education and training requirements, but also for the education and training needs to Australians into the mid-21st Century. Overall, the University views the AQF as a useful and easy to understand tool for the governance and management of accredited post-secondary qualifications in Australia.

Although Charles Sturt University suggests a number of areas for reform and priority to strengthen the AQF, the University would be concerned if substantial and significant changes were made to the Framework. In particular, the University would be deeply troubled by attempts to overly codify the AQF through regulation.

While generally supporting the existing AQF arrangements, Charles Sturt University has identified a number of areas for reform and priority to strengthen the AQF, including:

- Recognising that the AQF is a tool for curriculum design and assessment setting by professional trainers and educators and not the general public.

- Reinforcing the Framework's focus on skills and knowledge outcomes for students, as distinct from systematising and documenting provider operations.

- Clarifying and clearly delineating taxonomies and descriptors at and between AQF 5, 6 and 8 levels and between vocational education and training and higher education, Bachelor HONS, Graduate Certificate and Graduate Diploma at AQF 8 and AQF 8 and 9 between masters by research, coursework and extended.

- Ensuring flexibility for micro-credentialing, without creating complexity or reducing innovation.

- Resisting urge to prescribe volume of learning by focusing on skills and knowledge achievement, rather than creating costly bureaucratic processes like the European Credit Transfer and Accumulation System.

- Driving teaching and learning risk management and quality assurance through existing regulations and regulators, ASQA/SRTOs2015 and TEQSA/HESF2015.

- Refining governance, management and policy settings to reflect 21st Century best-practice.

Our submission provides a range of recommendations relating to the issues raised by the Panel in the *Review of the Australian Qualifications Framework Discussion Paper December 2018* that would facilitate better outcomes for students and our communities across New South Wales and Victoria.

I would be delighted to provide further information to the Panel and would be available to provide evidence at any proposed hearings that that Panel may undertake in relation to considering the merits of AQF reform.

Yours sincerely

Professor Andrew Vann
Vice-Chancellor

Terms of Reference

From Appendix A – Terms of Reference, Pages 39 of the *Review of the Australian Qualifications Framework Discussion Paper December 2018*:

Taking into account developments in school, vocational and higher education, the nature of work, qualifications frameworks internationally, and the views of international and domestic stakeholders, the AQF Review Panel will:

1. Review the AQF structure and components (levels, qualifications and relevant explanations) and associated guidelines to ensure that they:

    i. position the AQF for the future as a flexible and responsive instrument that guides the provision of consistent high quality and transparency in the Australian education system;

    ii. reflect the knowledge, skills and capabilities required by individuals for effective economic and social participation and which meet the current and anticipated skills needs of the Australian economy;

    iii. effectively facilitate access to learning pathways and mobility (for example through articulation arrangements, credit transfer and recognition of prior learning) within and between education sectors, AQF levels and AQF qualifications;

    iv. reflect international good practice.

2. Review the desirability and feasibility of developing a system for the quality assurance and incorporation within the AQF of non-AQF credentials such as skill sets, enabling and foundation courses, micro-credentials and in-service and advanced training provided by industry or professions and other non-AQF credentials.

3. Provide specific advice on:

    i. the relationships between levels and qualifications to ensure that they are clear, appropriate and unambiguous, taking into account their use in different education sectors;

    ii. whether the descriptors are expressed in simple language that supports ready and consistent interpretation and application;

    iii. volume of learning, including whether:

        a) it should be a time-based measure and, if so, whether it should be aligned with other time-based measures employed in vocational education and training sector specifications and requirements;

        b) it should be replaced by a credit point system;

        c) the disparities in volume of learning between qualifications at the same level can be supported by additional information such as prerequisite learning; and,

        d) it is a necessary descriptor in the AQF;

    iv.   the placement of vocational education and training (VET) and higher education (HE) qualifications in the AQF and consider:

          a)   any areas of convergence and optimal points of differentiation of VET and HE qualifications in general and specifically at levels 5, 6 and 8;

          b)   the extent to which the AQF currently implies a status hierarchy from VET to HE qualifications and whether this can be mitigated through changes to the structure or language of the AQF;

          c)   means by which the AQF can assist with greater consistency in regulation of AQF compliance between HE and VET;

    v.   whether and how the AQF should incorporate guidance for people wishing to build a qualification from a variety of courses and/or providers.

4. Provide advice on changes to AQF policies that would be required to give effect to the outcomes of the Panel's advice on the Terms of Reference 1-3 and other desirable changes. Consider whether any of these policies that deal with domestic matters should be situated within Tertiary Education Quality and Standards Agency and VET regulator registration and accreditation guidelines.

5. Consider what changes may be required to AQF governance arrangements, to the AQF itself, or to regulation that references the AQF, to ensure consistency of its application and to ensure ongoing currency of the AQF through monitoring and review.

6. The Panel will provide an initial report including recommendations on consequential changes to the AQF on the matters outlined above and, subsequent to consideration of that report, develop an implementation plan required for implementation of the changes.

1. Recommendations

Charles Sturt University makes the following recommends with regards reform of the Australian Qualifications Framework and the issues raised by the Australian Qualifications Framework Review Panel and the issues raised in the *Review of the Australian Qualifications Framework Discussion Paper December 2018*:

1.1 Australian Qualifications Framework Structure and Components

Charles Sturt University recommends that change to the AQF be minimal, as the University believes that the AQF, in its current form, delivers quality tertiary education and training outcomes for Australians.

Charles Sturt University recommends that the purpose of the AQF be clarified as a tool for curriculum design and assessment setting by professional trainers and educators, rather than as a resource for future and current students.

Charles Sturt University recommends that the:

- *AQF focus on skills and knowledge outcomes for students;*

- *taxonomies and descriptors at levels 5, 6, 8 and 9 of the AQF be further defined and clarified; and,*

- *AQF enable micro-credentialing without adding to regulation and/or reporting to maximise pathway options and mobility opportunities.*

Charles Sturt University recommends that the AQF be restricted to post-secondary education, that is, accredited vocational education and training and higher education only.

Charles Sturt University recommends adoption of the recommendations that the University has put forward in this Submission to ensure that the AQF remains world-class.

1.2 Non-Australian Qualifications Framework Credentials

Charles Sturt University recommends that:

- *in addition to the recommendations provided above, Non-AQF should not be accredited within the AQF, however providers should be able to recognise; and,*

- *volume of learning should not be prescribed in the AQF, provided that entry standards are defined and prescribed based on evidence obtained and regularly updated through sector and qualification benchmarking (please refer to recommendations provided below).*

1.3 Design and Function of the Australian Qualifications Framework

Charles Sturt University recommends that volume of learning should not be prescribed in the AQF, provided that entry standards are defined and prescribed based on evidence obtained and regularly updated through sector and qualification benchmarking (see recommendations below).

Charles Sturt University recommends that the taxonomies and descriptors at levels 5, 6, 8 and 9 of the AQF be further defined and clarified.

Charles Sturt University does not support amending the AQF to address perceptions of status differentials between vocational education and training and higher education in the Framework.

However, Charles Sturt University recommends that addressing perceptions of status differentials between vocational education and training and higher education are best achieved through investments in aspiration, awareness, support, brand, tool-kits, and life-long learning, as well as pathway options and mobility opportunities for future and current students.

Charles Sturt University recommends that improving teaching and learning risk management and quality assurance should be approached through existing regulations and regulators, that is, ASQA/SRTOs2015 and TEQSA/HESF2015.

Charles Sturt University does not support inclusion of guidance for people wishing to build a qualification from a variety of courses and/or providers in the AQF and recommends against such change to the Framework.

1.4 Changes to the Australian Qualifications Framework Policies

Charles Sturt University recommends that the AQF policies be reviewed, refreshed and refined according to the following principles:

- *a curriculum design and assessment setting tool for use by professional trainers and educators.*

- *focus on skills and knowledge outcomes for students (and not provider delivery processes).*

- *clarifies and clearly delineates taxonomies and descriptors, particular between type, level and sector.*

- *flexibility through micro-credentialing, without being bureaucratic.*

- *should not prescribe volume of learning.*

- *risk managed and quality assured through existing vocational education and training and higher education regulations and regulators; and,*

- *best-practice governance, management and policy settings through continuous improvement.*

1.5 Changes to Australian Qualifications Framework Governance

Charles Sturt University recommends that the governance arrangements for the AQF be reviewed, refreshed and refined to ensure that the Framework is skills, knowledge and workforce outcome focused on the 21st Century economic, social and environmental needs of Australians.

Consistent with recommendations provided above, Charles Sturt University recommends that the effectiveness of teaching and learning risk management and quality assurance be achieved through existing regulations and regulators.

2.   Introduction

Charles Sturt University is pleased to provide a submission to the Australian Government's Australian Qualifications Framework Panel's review of the Australian Qualifications Framework (AQF). The University's submission has been developed and prepared in response to the Panel's *Review of the Australian Qualifications Framework Discussion Paper December 2018*, which can be found at https://www.education.gov.au/australian-qualifications-framework-review-0 and is provided for reference at Appendix I.

Charles Sturt University has prepared a comprehensive and detailed submission containing commentary of the University's view and position regarding the effectiveness of the AQF and future possibilities for reform. Building on the University's commentary, view and position, Charles Sturt University also proposes a range of recommendations for improving the AQF.

3.   Charles Sturt University

Charles Sturt University is Australia's largest regional university, with more than 43,000 students and approximately 2,000 FTE staff. Established in 1989, the University traces its origins to the formation of the Bathurst Experimental Farm and Wagga Wagga Experimental Farm in the 1890s. In one form or another, research, innovation and education has been integral to the University's character and mission for more than a century.

Charles Sturt University is a unique multi-campus institution with campuses at Albury-Wodonga, Bathurst, Canberra, Dubbo, Goulburn, Manly, Orange, Parramatta, Port Macquarie and Wagga Wagga, as well as various study centres located throughout regional and rural south-eastern Australia.

The University's commitment to the development and sustainability of rural and regional Australia is informed by the unique research focus undertaken, and the partnerships it has formed with each of its campus' local communities, local industry, and with the broader regions it serves.

CSU offers a comprehensive suite of research and academic training programs that focus on addressing rural and regional labour market needs, growing regional economies, and preparing students for the jobs of the new economy through rural and regional Australia.

Particularly in health and medical related disciplines, Charles Sturt University seeks to address key training and equality of access issues across our rural and regional footprint, ensuring the critical supply of health professionals into local markets.

As one of Australia's largest online and distance education providers Charles Sturt University has been able to leverage its course profile and specialist expertise in education provision for the delivery of nationally available study programs. These programs support labour market skills development regardless of student location.

Our rural and regional focuses, as well as strength in online and distance education, position's Charles Sturt University as a leading institution in providing higher education opportunities to first-in-family applicants, mature-aged students, as well as those from disadvantaged backgrounds.

Increasing participation of Indigenous Australians in higher education has been a key focus area of the University's mission and ethos. Charles Sturt University consistently works in collaboration with Indigenous communities across our footprint to ensure access and develop links into the University. Our position as one of the top Australian universities for Indigenous participation is proof of our strong background in this regard.

The success of the University is demonstrated by its sector-leading performance in work-integrated learning, graduate employment and graduate incomes. Underpinning this success is the close links that the University has forged with industry, both regionally and nationally.

For example, the University is internationally recognised as a leader in work-integrated learning with students spending extended periods in employment with our industry partners as part of their degree learning and applying their knowledge in practice.

Research excellence, with a strong commitment to addressing the complex regional needs through innovation, has long been at the centre of Charles Sturt University's mission.

As evidenced by the recent Excellence in Research for Australia results (ERA 2015), Charles Sturt University is recognised internationally for competitive research strengths in agricultural science, horticultural production, food and wine sciences, crop and pasture production, veterinary science, animal production, education, curriculum and pedagogy, environmental science, applied ethics, philosophy, religious studies, criminology, nursing and marketing.

Charles Sturt University has a proud tradition of delivering high-quality research that creates new knowledge, benefits people's lives, enhances the profitability of regional industries and helps communities grow and flourish. Through its Higher Degree by Research programs, Charles Sturt University is training the next generation of researchers and professionals who use critical thinking and seek to influence the world for the better.

The recently announced AgriSciences Research and Business Park, to be located on the Wagga Wagga campus exemplifies our industry focus. The AgriSciences Research and Business Park will facilitate industry engagement and collaboration, economic growth, wealth creation, employment and skills development. Success will be evidenced by the recognition of Wagga Wagga as a world-standard centre for agricultural innovation, research and development, extension, education and training.

Today, Charles Sturt University continues a 100-year tradition of engagement and leadership with our local communities, of research and innovation in collaboration with industry, expansion in the educational opportunities offered to our diverse student body, and preparing students for employment markets emerging with the evolution of regional and the national economy.

4. Submission to Inquiry

4.1 Review of the Australian Qualifications Framework

Charles Sturt University is pleased to provide a submission to the Australian Government's Australian Qualifications Framework Panel's review of the Australian Qualifications Framework (AQF). The University's submission has been developed and prepared in response to the Panel's *Review of the Australian Qualifications Framework Discussion Paper December 2018*, which can be found at https://www.education.gov.au/australian-qualifications-framework-review-0 and is provided for reference at Appendix I.

Charles Sturt University has prepared a comprehensive and detailed submission containing commentary of the University's view and position regarding the effectiveness of the AQF and future possibilities for reform. Building on the University's commentary, view and position, Charles Sturt University also proposes a range of recommendations for improving the AQF.

(1)   **The Australian Qualifications Framework**

Modified from Appendix A – Terms of Reference, Pages 39 of the Review of the Australian Qualifications Framework Discussion Paper December 2018:

"The Australian Qualifications Framework (AQF) was introduced in 1995. It provided criteria for defining qualifications based on educational characteristics and outcomes for each qualification. The main AQF goals were to provide nationally consistent recognition of qualifications and facilitate student mobility between education sectors and the labour market.

Following a two-year review, a revised AQF was released in 2011, with a second edition released in 2013. It introduced the current ten level structure and aligned the AQF more closely with international practice. The revised AQF focused on descriptors for knowledge, skills and their application in increasing complexity over the ten levels of qualifications, complemented by volume of learning descriptors. It also introduced new and revised supporting policies.

The AQF remains an integral part of Australia's framework for quality assurance in education and training and is a key feature of Australia's international education standing. Since it was last revised, there have been innovations in qualifications frameworks internationally, as well as changes in the nature of work that affect Australia's skills requirements. There have also been changes in education and training practice and relevant regulatory structures. In light of these developments, the Australian Government has appointed an expert panel to review the AQF."

(2)   **Australian Qualifications Framework Panel Review**

Modified from Appendix A – Terms of Reference, Pages 39 to 41 of the Review of the Australian Qualifications Framework Discussion Paper December 2018:

"Taking into account developments in school, vocational and higher education, the nature of work, qualifications frameworks internationally, and

the views of international and domestic stakeholders, the AQF Review Panel will:

1. Review the AQF structure and components (levels, qualifications and relevant explanations) and associated guidelines to ensure that they:

i. position the AQF for the future as a flexible and responsive instrument that guides the provision of consistent high quality and transparency in the Australian education system;

ii. reflect the knowledge, skills and capabilities required by individuals for effective economic and social participation and which meet the current and anticipated skills needs of the Australian economy;

iii. effectively facilitate access to learning pathways and mobility (for example through articulation arrangements, credit transfer and recognition of prior learning) within and between education sectors, AQF levels and AQF qualifications;

iv. reflect international good practice.

2. Review the desirability and feasibility of developing a system for the quality assurance and incorporation within the AQF of non-AQF credentials such as skill sets, enabling and foundation courses, micro-credentials and in-service and advanced training provided by industry or professions and other non-AQF credentials.

3. Provide specific advice on:

i. the relationships between levels and qualifications to ensure that they are clear, appropriate and unambiguous, taking into account their use in different education sectors;

ii. whether the descriptors are expressed in simple language that supports ready and consistent interpretation and application;

iii. volume of learning, including whether:

a) it should be a time-based measure and, if so, whether it should be aligned with other time-based measures employed in vocational education and training sector specifications and requirements;

b) it should be replaced by a credit point system;

c) the disparities in volume of learning between qualifications at the same level can be supported by additional information such as prerequisite learning; and

d) it is a necessary descriptor in the AQF;

iv. the placement of vocational education and training (VET) and higher education (HE) qualifications in the AQF and consider:

> *a) any areas of convergence and optimal points of differentiation of VET and HE qualifications in general and specifically at levels 5, 6 and 8;*
>
> *b) the extent to which the AQF currently implies a status hierarchy from VET to HE qualifications and whether this can be mitigated through changes to the structure or language of the AQF;*
>
> *c) means by which the AQF can assist with greater consistency in regulation of AQF compliance between HE and VET;*
>
> *v. whether and how the AQF should incorporate guidance for people wishing to build a qualification from a variety of courses and/or providers.*

4. Provide advice on changes to AQF policies85 that would be required to give effect to the outcomes of the Panel's advice on the Terms of Reference 1-3 and other desirable changes. Consider whether any of these policies that deal with domestic matters should be situated within Tertiary Education Quality and Standards Agency and VET regulator registration and accreditation guidelines.

5. Consider what changes may be required to AQF governance arrangements, to the AQF itself, or to regulation that references the AQF, to ensure consistency of its application and to ensure ongoing currency of the AQF through monitoring and review.

6. The Panel will provide an initial report including recommendations on consequential changes to the AQF on the matters outlined above and, subsequent to consideration of that report, develop an implementation plan required for implementation of the changes."

4.2   Broad Consultation Considerations – The Review

Charles Sturt University welcomes the Australian Government's appointment of the Australian Qualifications Framework Panel and the Panel's review of the Australian Qualifications Framework (AQF).

Consistent with the Australian Qualifications Framework Panel's approach to consultation for the Review as set out on Pages 6 and 7 of the *Review of the Australian Qualifications Framework Discussion Paper December 2018*, Charles Sturt University is pleased to provide that Panel with comment and input on the AQF, as well as a suite of recommendations that the University believes would strengthen the AQF for all Australians.

In summary, Charles Sturt University provides its comment and input on the AQF and the Panel's Review based on the following themes:

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

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

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?

(1) **AQF – Fit for Purpose**

    (a) **Position of Charles Sturt University**

Charles Sturt University believes that the AQF is fit for purpose, not only for today's tertiary education and training requirements, but also for the education and training needs to Australians into the mid-21st Century. Overall, the University views the AQF as a useful and easy to understand tool for the governance and management of accredited post-secondary qualifications in Australia.

Although Charles Sturt University suggests a number of areas for reform and priority to strengthen the AQF, the University would be concerned if substantial and significant changes were made to the Framework. In particular, the University would be deeply troubled by attempts to overly codify the AQF through regulation.

    (b) **Charles Sturt University's Recommendations**

Refer recommendations in Sections 4.3 to 4.7 below.

(2) **AQF – Reforms and Priorities**

    (a) **Position of Charles Sturt University**

While generally supporting the existing AQF arrangements, Charles Sturt University has identified a number of areas for reform and priority to strengthen the AQF, including:

- Recognising that the AQF is a tool for curriculum design and assessment setting by professional trainers and educators and not the general public.

- Reinforcing the Framework's focus on skills and knowledge outcomes for students, as distinct from systematising and documenting provider operations.

- Clarifying and clearly delineating taxonomies and descriptors at and between:

  - AQF 5, 6 and 8 levels and between vocational education and training and higher education;

  - Bachelor HONS, Graduate Certificate and Graduate Diploma at AQF 8; and,

   o AQF 8 and 9 between masters by research, coursework and extended.

- Ensuring flexibility for micro-credentialing, without creating complexity or reducing innovation.

- Resisting urge to prescribe volume of learning by focusing on skills and knowledge achievement, rather than creating costly bureaucratic processes like the European Credit Transfer and Accumulation System.

- Driving teaching and learning risk management and quality assurance through existing regulations and regulators, ASQA/SRTOs2015 (refer, https://www.asqa.gov.au/about/australias-vet-sector/standards-registered-training-organisations-rtos-2015) and TEQSA/HESF2015 (refer, https://www.teqsa.gov.au/higher-education-standards-framework-2015).

- Refining governance, management and policy settings to reflect 21st Century best-practice.

(b) **Charles Sturt University's Recommendations**

Refer recommendations Sections 4.3 to 4.7 below.

(3) **AQF – Implementation Issues**

(a) **Position of Charles Sturt University**

In providing comment and input on the AQF, as well as recommendations for strengthening the Framework, Charles Sturt University has presented reform and priority suggestions below based on the key elements of the Terms of Reference which the Australian Government stipulated for the Australian Qualifications Framework Panel's Review as set out on Pages 39 to 41 of the *Review of the Australian Qualifications Framework Discussion Paper December 2018*.

1. Structure and components.

2. Non-AQF credentials.

3. Design and function.

4. Policies.

5. Governance.

(b) **Charles Sturt University's Recommendations**

Refer recommendations Sections 4.3 to 4.7 below.

4.3 Australian Qualifications Framework Structure and Components

Charles Sturt University welcomes the Australian Government's appointment of the Australian Qualifications Framework Panel and the Panel's review of the Australian Qualifications Framework (AQF) structure and components. The University believes that the following requirements must be taken into account when considering the challenges of and opportunities for AQF level, qualification and relevant explanations, as well as associated guidelines reform:

i.   Deliver the basis for a flexible and responsive vocational education and training and higher education qualifications instrument.

ii.   Address the knowledge, skills and capability required by society of the vocational education and training and higher education sectors.

iii. Provide access to learning pathways and mobility across the teaching and learning delivered across the vocational education and training and higher education sectors.

iv.   Reflect international best-practice in qualifications frameworks.

(1)   **The AQF as a Flexible and Responsive Instrument**

   (a)   **Position of Charles Sturt University**

   Charles Sturt University believes that the current AQF arrangements position accredited vocational education and training and higher education for the future. The Framework provides a flexible and responsive instrument that guides the provision of consistently high-quality teaching and learning delivery, as well as comparative transparency in the Australian education system.

   Other than the reforms and priorities outlined at Section 4.2.2, Charles Sturt University does not recommend any changes to the existing AQF in terms of instrument flexibility and responsiveness.

   Charles Sturt University considers that the goals and objectives of the AQF could be strengthened by clearly acknowledging in the Framework document that the AQF is a tool for curriculum design and assessment setting by professional trainers and educators and not the general public.

   (b)   **Charles Sturt University's Recommendations**

   Charles Sturt University recommends that change to the AQF be minimal, as the University believes that the AQF, in its current form, delivers quality tertiary education and training outcomes for Australians.

   Charles Sturt University recommends that the purpose of the AQF be clarified as a tool for curriculum design and assessment setting by professional trainers and educators, rather than as a resource for future and current students.

(2)   **Knowledge, Skills and Capability Requirements of the AQF**

(a)   **Position of Charles Sturt University**

Charles Sturt University believes that the current AQF arrangements ensure that the Framework addresses the knowledge, skills and capabilities required by individuals for effective economic and social participation and to meet the current and anticipated skills needs of the Australian economy. The University believes that the knowledge, skills and capability requirements of the Framework are effective across accredited vocational education and training and higher education.

Charles Sturt University does, however, believe that the AQF could be strengthened by:

- Reinforcing the Framework's focus on skills and knowledge outcomes for students, as distinct from systematising and documenting provider operations.

- Clarifying and clearly delineating taxonomies and descriptors at and between:

  o   AQF 5, 6 and 8 levels and between vocational education and training and higher education;

  o   Bachelor HONS, Graduate Certificate and Graduate Diploma at AQF 8; and,

  o   AQF 8 and 9 between masters by research, coursework and extended.

- Ensuring flexibility for micro-credentialing, without creating complexity or reducing innovation.

(b)   **Charles Sturt University's Recommendations**

Charles Sturt University recommends that the:

- *AQF focus on skills and knowledge outcomes for students;*

- *taxonomies and descriptors at levels 5, 6, 8 and 9 of the AQF be further defined and clarified; and,*

- *AQF enable micro-credentialing without adding to regulation and/or reporting.*

(3)   **Access to Learning Pathways and Mobility Across the AQF**

(a)   **Position of Charles Sturt University**

Charles Sturt University believes that the current AQF arrangements position accredited vocational education and training and higher education to effectively facilitate access to learning pathways and

mobility, including, for example through articulation arrangements, credit transfer and recognition of prior learning both within and between vocational education and training and higher education, as well as within AQF levels and between AQF qualifications.

While flexibility for micro-credentialing, without creating complexity or reducing innovation would boost access to learning pathways and mobility across the AQF, Charles Sturt University considers that pathway and mobility course curriculum and assessment design should be undertaken at the institutional level, that is for self-accrediting higher education providers and at the Service Skills Organisation level in the case of vocational education and training Training Packages (refer, https://www.asqa.gov.au/about/australias-vet-sector/training-packages). Targeted customisation and tailoring of courses by registered training providers and higher education providers should be encouraged to boost learning pathways and drive mobility access within provider markets.

Charles Sturt University does not support expansion of the AQF to include non-tertiary education and training qualifications. Courses of study such as Year 12 completion and Foundation year should be referenced in the Framework including defining where they provide entry to qualifications, but such courses should not be added as levels within the AQF itself.

(b) **Charles Sturt University's Recommendations**

Charles Sturt University recommends that the AQF enable micro-credentialing without adding to regulation and/or reporting to maximise pathway options and mobility opportunities.

Charles Sturt University recommends that the AQF be restricted to post-secondary education, that is, accredited vocational education and training and higher education only.

(4) **International Best-Practice – Qualification Frameworks**

(a) **Position of Charles Sturt University**

Charles Sturt University believes that the AQF reflects international best-practice. Indeed, the AQF and the ASQA/SRTOs2015 (refer, https://www.asqa.gov.au/about/australias-vet-sector/standards-registered-training-organisations-rtos-2015) and TEQSA/HESF2015 (refer, https://www.teqsa.gov.au/higher-education-standards-framework-2015) regulatory arrangements are regularly cited as best-practice in tertiary education and training qualification risk management, quality assurance and continuous improvement. For example, papers presented at the International University Teaching Conference held at Charles Sturt University's Port Macquarie Campus in 2018 (refer, https://www.iutconference.com).

Implementation of the AQF reforms and priorities proposed by Charles Sturt University and outlined at Section 4.2.2 and

discussed in greater detail throughout Section 4, would ensure that the Framework remains a world-leading qualification framework and would ensure that it reflects international best-practice.

(b) **Charles Sturt University's Recommendations**

Charles Sturt University recommends adoption of the recommendations that the University has put forward in this Submission to ensure that the AQF remains world-class.

4.4 Non-Australian Qualifications Framework Credentials

(a) **Position of Charles Sturt University**

Charles Sturt University welcomes the Australian Government's appointment of the Australian Qualifications Framework Panel and the Panel's review of the non-Australian qualifications framework credentials of the Australian Qualifications Framework (AQF). The University believes that the following requirements must be taken into account when considering the challenges of and opportunities for including the desirability and feasibility of a system for the quality assurance and incorporation within the AQF of non-AQF credentials such as skill sets, enabling and foundation courses, micro-credentials and in-service and advanced training provided by industry or professions and other non-AQF credentials:

- Non-AQF credentials should not be defined and delineated by taxonomy or descriptor in the AQF, as to do so would greatly constrain product, service and market innovation.

- Non-AQF credentials should not be accredited within the AQF, as to do so would create two levels of product and provider in the professional development and related market place.

- Student effort and achievement in non-AQF credentials should be captured by providers of accredited training and education through recognition of prior learning in the case of vocational education and training and provision of credit in the case of higher education.

- Reinforce the Framework's focus on skills and knowledge outcomes for students, as distinct from systematising and documenting provider operations.

- Ensure flexibility for micro-credentialing, without creating complexity or reducing innovation (refer dot points one to three above).

- Further to dot points one to three above, do not prescribe volume of learning in non-AQF credentials, leave decisions on recognising and crediting student effort and achievement in non-AQF credentials to registered training organisations and higher education providers.

(b) **Charles Sturt University's Recommendations**

Charles Sturt University recommends that:

- *in addition to the recommendations provided above, Non-AQF should not be accredited within the AQF, however providers should be able to recognise; and,*

- *volume of learning should not be prescribed in the AQF, provided that entry standards are defined and prescribed based on evidence obtained and regularly updated through sector and qualification benchmarking, refer recommendations provided below.*

4.5 Design and Function of the Australian Qualifications Framework

Charles Sturt University welcomes the Australian Government's appointment of the Australian Qualifications Framework Panel and the Panel's review of the Australian Qualifications Framework (AQF) design and functions. The University believes that the following requirements must be taken into account when considering the challenges of and opportunities for enhancing the design and improving the function of the AQF to ensure:

i. Effective relationships between AQF levels and qualifications.

ii. Clear and accurate descriptors for interpretation and application of the AQF.

iii. Sufficient volume of learning at each level of the AQF.

iv. Placement of vocational education and training and higher education in the AQF.

v. Qualification building advice across vocational education and training and higher education for students.

(1) **Relationships Between AQF Levels and Qualifications**

(a) **Position of Charles Sturt University**

Charles Sturt University believes that the relationships between levels and qualifications of the existing AQF ensure that the levels and qualifications contained in the Framework are clear, appropriate and unambiguous. Further, the University believes that the existing AQF arrangements take into account the use of levels and qualifications in different education sectors.

The University does believe that it is important to not only recognise, but to stress that the AQF is a tool for curriculum design and assessment setting by professional trainers and educators and not the general public. Including a clear statement to this effect in the AQF will ensure that the purpose and use of the Framework is clear.

(b) **Charles Sturt University's Recommendations**

Refer recommendations provided above and below.

(2) **Descriptors for Interpretation and Application of the AQF**

(a) **Position of Charles Sturt University**

Charles Sturt University believes that the AQF descriptors are effectively expressed in simple language that support ready and consistent interpretation and application across registered training organisations and higher education providers. The University does, however believe that the descriptors for interpretations and application of the AQF could be strengthened by:

- Clarifying and clearly delineating taxonomies and descriptors at and between:

    o AQF 5, 6 and 8 levels and between vocational education and training and higher education;

    o Bachelor HONS, Graduate Certificate and Graduate Diploma at AQF 8; and,

    o AQF 8 and 9 between masters by research, coursework and extended.

(b) **Charles Sturt University's Recommendations**

Refer recommendations provided above.

(3) **Volume of Learning in the AQF**

(a) **Position of Charles Sturt University**

Charles Sturt University believes that quantifying and qualifying volume of learning in the AQF is dated and does not reflect 21st Century teaching and learning thinking. The University believes that the AQF should focus on skills and knowledge outcomes for students, as distinct from systematising and documenting provider operations.

However, the University stresses that if such an approach was to be adopted, the need for ensuring that entry standards to each qualification level of the AQF would need to be defined and prescribed that are consistent with the expected volume of learning. Further, defining and prescribing entry standards would need to be determined based on evidence obtained and regularly updated from sector and qualification benchmarking. This approach would be essential to ensure that system gaming, as has occurred historically did not occur in the future, for example awarding doctorates below AQF 10 level and excessively reducing the time to deliver Masters programs.

Consequently, Charles Sturt University encourages both the Panel and the Australian Government to resist the urge to prescribe volume of learning by focusing on skills and knowledge achievement, rather than creating costly bureaucratic processes like the European Credit Transfer and Accumulation System.

With reference to the volume of learning issues raised in the *Review of the Australian Qualifications Framework Discussion Paper December 2018*, Charles Sturt University provides commentary below on:

  a) Time-based measures.

  b) A credit point system.

  c) Volume of learning across levels, particularly disparities between levels.

  d) Relevant descriptors.

(i)   **AQF Time-Based Measures**

  (A)   **Position of Charles Sturt University**

Charles Sturt University believes that the various levels of the AQF should not include time-based measures.

Time-based measures are adequately addressed in the vocational education and training sector through the qualification specifications and requirements defined and prescribed through the Training Package system.

Determination of time-based measures for higher education qualifications across the AQF should be determined by the accrediting body, that is academic governing bodies for universities and self-accrediting higher education providers, and TEQSA for non-self-accrediting institutions.

  (B)   **Charles Sturt University's Recommendations**

Charles Sturt University recommends that volume of learning should not be prescribed in the AQF, provided that entry standards are defined and prescribed based on evidence obtained and regularly updated through sector and qualification benchmarking, refer recommendations provided below.

(ii)   **AQF Credit Point System**

  (A)   **Position of Charles Sturt University**

Charles Sturt University does not support development and inclusion of a credit point system for time-based learning for the reasons set out in Section 4.5(3)(a)(i)(A) above.

(B) **Charles Sturt University's Recommendations**

Refer previous recommendation above.

(iii) **Disparity in Volume of Learning Across the AQF**

(A) **Position of Charles Sturt University**

While Charles Sturt University believes that disparities in volume of learning between qualifications at the same level of the AQF could be supported by additional information such as prerequisite learning, the University does not believe such arrangements should be codified for the reasons provided in Section 4.5(3)(a)(i)(A) above.

(B) **Charles Sturt University's Recommendations**

Refer previous recommendation above.

(iv) **Necessary Descriptors for the AQF**

(A) **Position of Charles Sturt University**

Charles Sturt University does not believe that definitions of time-based learning requirements are a necessary descriptor in the AQF at all levels, again for the reasons provided in Section 4.5(3)(a)(i)(A) above.

(B) **Charles Sturt University's Recommendations**

Refer previous recommendation above.

(4) **Placement of Vocational Education and Training and Higher Education in the AQF**

Charles Sturt University believes that the current arrangements for placement of vocational education and training and higher education in the AQF are satisfactory and should not be changed. The University believes that the AQF should focus on skills and knowledge outcomes for students, rather than type of qualification at the various levels of the Framework, that is vocational education and training or higher education.

Consequently, Charles Sturt University encourages both the Panel and the Australian Government to resist incorporating broader training, education and workforce public policy considerations in the AQF, such as status hierarchy of vocation education and training and higher education.

With reference to the placement of vocation education and training and higher education in the AQF raised in the *Review of the Australian Qualifications Framework Discussion Paper December 2018*, Charles Sturt University provides commentary below on:

a) Convergence and differentiation at AQF levels 5, 6 and 8.

b) The status hierarchy of vocation education and training and higher education in the AQF.

c) Greater consistency in regulation between vocational education and training and higher education across the AQF.

   (i)   **Convergence and Differentiation – AQF Levels5, 6 and 8**

        (A)   **Position of Charles Sturt University**

Charles Sturt University believes that areas of convergence and optimal points of differentiation of vocational education and training and higher education qualifications in general and specifically at levels 5, 6 and 8 must be reformed. However, reform of the AQF at levels 5, 6 and 8 should be undertaken by clarifying and clearly delineating taxonomies and descriptors at and between:

- AQF 5, 6 and 8 levels and between vocational education and training and higher education;

- Bachelor HONS, Graduate Certificate and Graduate Diploma at AQF 8; and,

- AQF 8 and 9 between masters by research, coursework and extended.

        (B)   **Charles Sturt University's Recommendations**

Charles Sturt University recommends that the taxonomies and descriptors at levels 5, 6, 8 and 9 of the AQF be further defined and clarified.

   (ii)   **Status Hierarchy – Vocational Education and Training and Higher Education in the AQF**

        (A)   **Position of Charles Sturt University**

Charles Sturt University does not believe that the AQF currently implies a status hierarchy between vocational education and training and higher education qualifications. Consequently, the University encourages both the Panel and the Australian Government to resist incorporating broader training, education and workforce public policy considerations in the AQF, such as status hierarchy of vocation education and training and higher education and that this must be mitigated through changes to the structure or language of the AQF.

Such policy considerations are best addressed through:

- Investment in tertiary education and training aspiration, including values and cultural change program to ensure vocations are as valued in Australia as they are in Germany, Scandinavia and Singapore.

- Career awareness campaign focused on outcome (employment, wealth, business etc.) rather than output (Certificate IV compared to Bachelor etc.).

- Support for student learning at all levels.

- Rebranding from trade to technical (transition TAFE branding to Polytechnic like Singapore).

- Primary and secondary school teacher tool-kits that support equal value of vocational education and training and higher education.

- Promotion of life-long learning.

- Increase pathways and mobility (refer earlier Sections).

(B)   **Charles Sturt University's Recommendations**

Charles Sturt University does not support amending the AQF to address perceptions of status differentials between vocational education and training and higher education in the Framework.

However, Charles Sturt University recommends that addressing perceptions of status differentials between vocational education and training and higher education are best achieved through investments in aspiration, awareness, support, brand, tool-kits, and life-long learning, as well as pathway options and mobility opportunities for future and current students.

(iii)   **Greater Consistency in Regulation Between Vocational Education and Training and Higher Education across the AQF**

(A)   **Position of Charles Sturt University**

Charles Sturt University believes that the existing regulation of AQF compliance between vocational education and training to higher education is satisfactory and does not require reform. The University believes that improving teaching and learning risk management and quality assurance through existing regulations and regulators, ASQA/SRTOs2015 (refer, https://www.asqa.gov.au/about/australias-vet-sector/standards-registered-training-organisations-rtos-2015)

and TEQSA/HESF2015 (refer,
https://www.teqsa.gov.au/higher-education-standards-framework-2015) is the most appropriate course of action to strengthen the AQF into the 21st Century.

(B)   **Charles Sturt University's Recommendations**

Charles Sturt University recommends that improving teaching and learning risk management and quality assurance should be approached through existing regulations and regulators, that is, ASQA/SRTOs2015 and TEQSA/HESF2015.

(5)   **Qualification Building Guidance for Students – Across the AQF**

(a)   **Position of Charles Sturt University**

Charles Sturt University believes that the AQF does not need to incorporate guidance for people wishing to build a qualification from a variety of courses and/or providers, as the Framework is a tool for curriculum design and assessment setting by professional trainers and educators and not the general public.

(b)   **Charles Sturt University's Recommendations**

Charles Sturt University does not support inclusion of guidance for people wishing to build a qualification from a variety of courses and/or providers in the AQF and recommends against such change to the Framework.

4.6   **Changes to the Australian Qualifications Framework Policies**

(1)   **Position of Charles Sturt University**

Charles Sturt University welcomes the Australian Government's appointment of the Australian Qualifications Framework Panel and the Panel's review of the Australian Qualifications Framework (AQF) policy settings. To effect the improvements put forward by Charles Sturt University in this submission to the AQF, it will be crucial that the Panel's advice and the Government's action take into account a range of critical AQF policies.

The University believes that the following principles must be taken into account when considering the challenges of and opportunities for reform of AQF policies. That the AQF:

- is a curriculum design and assessment setting tool for use by professional trainers and educators.

- focus on skills and knowledge outcomes for students (and not provider delivery processes).

- clarifies and clearly delineates taxonomies and descriptors, particular between type, level and sector.

- includes flexibility through micro-credentialing, without being bureaucratic.

- should not prescribe volume of learning.

- be risk managed and quality assured through existing vocational education and training and higher education regulations and regulators.

- adopt best-practice governance, management and policy settings through continuous improvement.

(2)   **Charles Sturt University's Recommendations**

Charles Sturt University recommends that the AQF policies be reviewed, refreshed and refined according to the following principles:

- *a curriculum design and assessment setting tool for use by professional trainers and educators.*

- *focus on skills and knowledge outcomes for students (and not provider delivery processes).*

- *clarifies and clearly delineates taxonomies and descriptors, particular between type, level and sector.*

- *flexibility through micro-credentialing, without being bureaucratic.*

- *should not prescribe volume of learning.*

- *risk managed and quality assured through existing vocational education and training and higher education regulations and regulators; and,*

- *best-practice governance, management and policy settings through continuous improvement.*

4.7   **Changes to Australian Qualifications Framework Governance**

(1)   **Position of Charles Sturt University**

Charles Sturt University welcomes the Australian Government's appointment of the Australian Qualifications Framework Panel and the Panel's review of the Australian Qualifications Framework (AQF) governance arrangements. To effect improvements to the AQF it will be crucial that the Panel's advice and the Government's action strengthen AQF governance.

The University believes that the following considerations must be taken into account when considering the challenges of and opportunities for enhancement of AQF governance arrangements, to the AQF itself, or to regulation that references the AQF, to ensure consistency of the Framework's application and to ensure ongoing currency of the AQF through monitoring and review of AQF effectiveness:

- Refining governance, management and policy settings of the AQF to ensure that the Framework is skills, knowledge and workforce outcome focused on the 21st Century economic, social and environmental needs of Australians.

- Ensuring effectiveness by driving teaching and learning risk management and quality assurance through existing regulations and regulators, ASQA/SRTOs2015 (refer, https://www.asqa.gov.au/about/australias-vet-sector/standards-registered-training-organisations-rtos-2015) and TEQSA/HESF2015 (refer, https://www.teqsa.gov.au/higher-education-standards-framework-2015).

(2)   **Charles Sturt University's Recommendations**

Charles Sturt University recommends that the governance arrangements for the AQF be reviewed, refreshed and refined to ensure that the Framework is skills, knowledge and workforce outcome focused on the 21st Century economic, social and environmental needs of Australians.

Consistent with recommendations provided above, Charles Sturt University recommends that the effectiveness of teaching and learning risk management and quality assurance be achieved through existing regulations and regulators.

5. **Conclusion**

Charles Sturt University believes that the AQF is fit for purpose, not only for today's tertiary education and training requirements, but also for the education and training needs to Australians into the mid-21st Century. Overall, the University views the AQF as a useful and easy to understand tool for the governance and management of accredited post-secondary qualifications in Australia.

Although Charles Sturt University suggests a number of areas for reform and priority to strengthen the AQF, the University would be concerned if substantial and significant changes were made to the Framework. In particular, the University would be deeply troubled by attempts to overly codify the AQF through regulation.

While generally supporting the existing AQF arrangements, Charles Sturt University has identified a number of areas for reform and priority to strengthen the AQF, including:

- Recognising that the AQF is a tool for curriculum design and assessment setting by professional trainers and educators and not the general public.

- Reinforcing the Framework's focus on skills and knowledge outcomes for students, as distinct from systematising and documenting provider operations.

- Clarifying and clearly delineating taxonomies and descriptors at and between AQF 5, 6 and 8 levels and between vocational education and training and higher education, Bachelor HONS, Graduate Certificate and Graduate Diploma at AQF 8 and AQF 8 and 9 between masters by research, coursework and extended.

- Ensuring flexibility for micro-credentialing, without creating complexity or reducing innovation.

- Resisting urge to prescribe volume of learning by focusing on skills and knowledge achievement, rather than creating costly bureaucratic processes like the European Credit Transfer and Accumulation System.

- Driving teaching and learning risk management and quality assurance through existing regulations and regulators, ASQA/SRTOs2015 and TEQSA/HESF2015.

- Refining governance, management and policy settings to reflect 21st Century best-practice.

Our submission provides a range of recommendations relating to the issues raised by the Panel in the *Review of the Australian Qualifications Framework Discussion Paper December 2018* that would facilitate better outcomes for students and our communities across New South Wales and Victoria.