Review of the Australian Qualifications Framework

Discussion Paper

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

S Bruce Dowton, Vice-Chancellor

Respondent organisation (where relevant)

Macquarie University

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

Macquarie University believes the AQF is fit for purpose overall in setting a minimum standard for qualifications and level descriptors. However, some of the level descriptors are inadequate. The Discussion Paper has highlighted TEQSA concerns about AQF Level . We believe AQF Level 8 and to a lesser extent Level 9 are far too broad and propose that this is also addressed during the Review.

Honours Degrees, on the one hand, and Graduate Certificates and Graduate Diplomas, on the other, are all classified at AQF Level 8 but are not equivalent. Pathways into these awards are very different. An Honours student is typically the best student undertaking an advanced curriculum, whereas a Graduate Certificate or Diploma student is typically an average student undertaking a non-advanced curriculum, often to develop cognate knowledge required to study at AQF Level 9. Each set of awards has value for different cohorts but the level the cohorts achieve will be substantially different. (This point is developed below in response to question 2.)

The Recognition of Prior Learning section of the AQF is useful as a guidance document but would benefit from updating to include aligning shorter form credentials (including micro-credentials) to AQF levels. The current pathways advice tends to focus on moving "up" levels and would benefit from recognising more directly that students are studying across or even down levels to re-skill for changing employment or nature of work.

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.

AQF Levels and Taxonomy

As proposed above, Macquarie takes the view that this reform should be a priority for the Review. We are in favour of the proposal to only use AQF levels to describe knowledge and skills and their application, and then to provide a description of each qualification type that is linked to the level. It would also be timely to revise the AQF descriptors to simplify them and ensure there are clear distinctions between levels. At both AQF Levels 8 and 9, there is certainly too much overlap between the level descriptors, and this is particularly difficult at AQF Level 8 which has three different qualifications without separate descriptions.

The Discussion Paper raises the possibility of 'defining the context for learning outcomes such as autonomy and responsibility, in the application of knowledge and skills domain of the AQF taxonomy'. One way of differentiating between the qualifications available within AQF Level 8 (and to an extent Level 9) would be to increase the number of AQF levels or to introduce sub-levels of qualifications. Another way would be to develop terminology and structures, based on separate pathways: (i) professional development or further learning qualifications (Graduate Certificate, Graduate Diplomas, and possibly Masters (Coursework); and (ii) research-focused qualifications (Honours Degrees and Masters (Research), and Doctorate). This would help to distinguish the skills and knowledge of an Honours Degree from a Graduate Certificate or Diploma, based on their intended design or purpose. Such an approach would also help to link different short courses or micro-credentials to qualifications within an AQF level if required.

Enterprise and Social Skills

Macquarie recognises the importance of enterprise and social skills and already embeds them into its courses. We therefore support the view that these skills should be included in the AQF more formally but do not believe that the AQF should prescribe a universal set of enterprise and social skills across qualifications. We agree with the point made in the Discussion Paper that these skills (and the level at which they should be learned and assessed) are dependent on context, within disciplines or vocations.

The University believes that providers would benefit from having an expanded list of enterprise and social skills in the AQF, but not as a taxonomy. We strongly agree with the observation made in the preface to the Discussion Paper that this approach would need to be regularly reviewed and updated because, by definition, the focus on different enterprise and social skills in the workplace will change over short periods of time. For the same reason, we believe that any list of these kind of skills must be kept at a broad glossary level to preserve its currency and that there should be an onus on providers to ensure their individual qualifications are as up-to-date as possible through usual quality assurance review process. We propose that the Review should consider the appropriate contextual application of such skills.

We believe that any guidance should recognise that, in some professional courses, elements of enterprise and social skills are beneficial rather than necessary and therefore should not be mandated. Such guidance could distinguish skills on the basis of how directly they are taught and independently assessed. Additionally, we believe that guidance should emphasise the importance of meaningful assessment of such skills and allow providers to determine that the skills can be aligned to different AQF levels within specific discipline areas.

Shorter Form Credentials/Micro-Credentials

The University supports the inclusion of shorter form credentials (including micro-credentials) in the AQF; however, the *Discussion Paper* rightly suggests that the focus of the AQF (as a qualifications framework) should remain on full qualifications and the Review should not seek to add these credentials as new qualification types.

By definition, shorter form credentials are bespoke, niche and tailored to the needs of the individual. They need to be agile so they can be tailored at the point of need in a timely manner. If Australia were to set up an equivalent to the New Zealand Qualifications Authority to accredit these credentials, this would be an additional regulatory burden for existing education regulators and would presumably increase institutional costs in registration fees or other mechanisms. It is worth noting that, whether a shorter form credential is accredited or not, providers will still be required to assess and determine the extent to which a credential from another provider can contribute to its AQF qualifications. There will be substantial operational costs in doing this and Macquarie is of the view that the sector should not subsidise a new accrediting authority at the same time. An accrediting body might inadvertently stifle the flexible benefits of shorter form credentials from student and employer points of view.

Self-accrediting universities that wish to develop these credentials do not require approval from a regulatory body for their AQF qualifications and certainly should not need approval for shorter form credentials or the designation of an AQF level to which they can contribute. These credentials will more easily align to AQF qualifications in this sector while other categories of provider may require more guidance and oversight regarding robust design principles and quality assurance processes to ensure that they are appropriate to the AQF level they are set against. In particular, it will be important to set specific learning outcomes and assessment tasks as well as methods of delivery so they can be readily understood by students, employers and other providers.

In addition to encouraging all providers to have robust processes to evaluate more informal and non-formal RPL through the diverse range of shorter form credentials, providers who design them should have internal mechanisms that enable students to build coherent groups should they wish to work towards an AQF qualification. This may lessen the requirement of an accrediting body.

Macquarie sees most value in an approach that seeks to align shorter form credential types to AQF levels by assigning them across a number of applicable levels. What is then required is for the AQF to encourage providers to have robust defensible frameworks and processes to recognise these credentials at the appropriate AQF level. This could be achieved with some re-wording of the current AQF qualifications pathway policy. This guidance should continue to encourage providers to maintain precedent databases so consistent decisions can be made and so, ideally, prospective students are able to see what types of RPL would be available. This will assist providers to develop shorter form credential agreements amongst issuing organisations as is currently envisaged by the AQF qualifications pathways policy.

The University believes that if providers are to assess how much credit for an AQF qualification can be granted from a shorter form credential, it will be necessary for the provider to have a robust and defensible policy that converts informal hours of study to credit points. This issue is discussed below; however, each provider must also be able to satisfy itself that the learning outcome(s) of any units have been met. To facilitate this, providers should clearly identify the AQF level at which a credential can contribute specific learning outcomes and modes of assessment. It will be difficult to grant credit for certain types of shorter form credentials that may not have an assessment or in the case of a MOOC where the student may have opted not to take an assessment. Where an assessment is lacking or not thought to be sufficiently robust or at the correct level for a provider to grant credit towards an AQF level, providers will need to support the student being assessed in some way to ensure they have met the learning outcomes of the relevant unit(s). This should be taken up in any guidance.

Section 2.1.10 of the AQF Qualifications Pathways policy has been very useful in providing suggested levels of credit towards qualifications as the basis for negotiation for credit provided through RPL. It might be useful if similar optional guidance is provided to group different types of shorter form credentials, perhaps based on their type of delivery and assessment, to outline what providers should consider when granting amounts of credit.

Volume of learning (Credit Points vs Hours)

The University recognises that measuring volume of learning in years will be increasingly problematic due to increasing diversity in delivery methods. However, in many courses expressions in typical years will continue to have currency for many prospective students and for legislative reporting of courses to the Commonwealth.

The University is broadly in favour of expressing volume of learning in hours but is strongly of the view that self-accrediting universities should be able to translate amounts of hours to their own credit point systems. Although it is important to express anticipated volume of learning, the University also believes it is important for providers to continue to focus on linking the learning of their students to specific outcomes or competencies. Consistent approaches to volume of learning may assist in comparing learning outcomes across qualifications; however, this should not inadvertently result in a requirement that courses should be designed in blocks of a certain number of hours to demonstrate specific levels or qualifications.

As the *Discussion Paper* recognises, it would be difficult to assess the amount of self-managed learning that should be undertaken in a qualification and so guidance may be useful to assist providers. The focus of any guidance should be to categorise different examples of learning and emphasise the importance of providers having a rigorous and defensible process for assessing learning based on course outcomes.

The University does not favour the use of "new learner" in place of "typical learner". While noting that the term "typical learner" might be understood as referring to an average learner, which is hard to define, we believe that the concept of new learner is still somewhat subjective, particularly when a lack of tertiary study experience can be overcome by informal or non-formal learning. Using the concept of a "new learner" to establish a baseline of volume of learning arguably becomes less relevant at each subsequent AQF level. As an example, we believe most Bachelor-level students would not identify themselves as "new learners" even though significant learning resources are devoted by the University to induct students into studying concepts and practices at Bachelor level. Very few Masters level students would describe themselves as "new learners", even if it was clear this was calibrated at each AQF level.

In this context, the University believes "typical learner" already allows flexibility in course duration for different delivery methods and for more advanced students. "Typical learner" is therefore an appropriate baseline. We believe that defining duration on the basis of a new learner implies that any "non-new" learner should be able to complete the course more quickly. Of course, this will not be the case for all students and we are concerned that this definition may inadvertently promote unreasonable expectations. We believe "typical learner" provides the correct impression of the anticipated duration of a course, based on the course designer's experience of its anticipated cohort. As noted in the *Discussion Paper*, "typical learner" already provides for flexibility around volume of learning for course delivery and flexibility for more able or experienced students.

The University is not in favour of trying to standardise values in a compulsory national Credit Point system because, even if it is phased in over several years, this will be a huge undertaking, particularly for self-accrediting providers who currently define their own Credit Point values. A national Credit Point system would require substantial curriculum re-design as well as reconfiguration of student administration systems, which would be expensive and time consuming. We do not believe there are sufficient associated benefits to justify this substantial effort. A fully optional system that would exist to allow a provider to match its existing Credit Point system against a baseline would be preferable.

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.

Macquarie has identified implementation issues in the above responses.

Other