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

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Respondent organisation (where relevant)

Torrens University Australia

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

Australia's future higher education system requires policy settings that ensure quality while supporting innovation and flexibility, given the accelerating pace of economic and technological change and the need for universities to remain contemporary. The higher education sector must also become more responsive to the needs of students, whose increasing heterogeneity and divergent needs regarding the timing, location and modality of their study require an adaptable and student-centric university system.

Education and the acquisition of work-focused skills are the foundation of overall economic growth, productivity and national prosperity. Consequently, an effective higher education system should produce world-class teaching and research with a focus on employable graduates, and universities should be supported by governments to create these foundations for public benefit.   To deliver an effective and transparent higher education system we need a relevant and transparent national policy to regulate and streamline our educational qualifications. This policy framework needs to be respected, accessible and perceived to be valuable for education, industry, Government and all other stakeholders. There also needs to be transparent relationship to other international frameworks regarding the common accord and support of cross institutional credit,

mobility and internationalisation. We have not yet reached this optimal solution. We would argue that the Review of the Australian Qualification Framework (AQF) is timely.

The importance of the AQF in providing an international recognized national framework that integrates senior secondary school, vocational education and training (VET) and higher education cannot be underestimated. Over the last 12 years, the AQF has assisted in providing a quality assurance framework that supports our well-respected tertiary education system with the overlapping links to the senior secondary schools.

The changing nature of work is creating new challenges for the Australian Education system. The increasing focus on lifelong learning, impact of technology, changing demographic shifts, and the need for faster, cheaper, more self-directed and on demand learning are requiring a more flexible and transparent AQF national framework. The greater change in careers will occur post-graduation so whatever is created needs to have a consumer and industry friendly language and explanatory notes. It is important that we find models where the educational and industry sectors can work in an aligned and transparent manner that does not compromise the rigor and robustness of the Framework.

Education is now moving into a dynamic space where employers are looking for specific skills and capabilities, which will grow in importance, in parallel with work changes due to such initiatives as automation and digitalization. As such, a robust and contemporary AQF will help to create parity between higher order competencies and academic qualifications. The Alumni of all the Educational Institutions want to be able to return to their alma mater and find new innovative and flexible short courses/micro credentials that allow them to improve their skill base and build new formal qualifications as they adapt to the rapidly changing workforce paradigms.

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.

1. Assignment of some shorter form credentials to an AQF level

What is a micro credential at Torrens University?

For the purpose of this submission we choose to define micro credentials as: a self-contained, set (e.g. 8-10) of short courses or accredited independent skills that can be combined to create a credential. It remains to be determined if a number of micro credentials could or should be combined into an accredited subject.

We believe that the AQF already accommodates this interpretation of micro credentials but a guiding document is required to ensure alignment between models (and levels) delivered by various institutions. The document could help align micro credentials to specific levels of descriptors i.e. knowledge/competency, skills and application of knowledge and skills, and define 'competency' so that the skills that industry requires are promoted within the AQF. The question remains whether recognition would require the development of a transparent model where specific allocation of a credit points system can be implemented for alignment across institutions.

The flexibility to recognise qualifications based on aggregated micro-credentials/ short courses and/or a combination of these with recognition of prior learning (RPL) based on previous work experience and/or study should be promoted; however, this should be considered in the context of potential risks arising from inconsistent academic standards, quality and governance. Competency and learning do not necessarily align. A detailed guideline is required on how skills and learning obtained through professional work experience can be translated into an equivalent AQF Level, especially for mature students.

As outlined above, if we are in agreement that micro credentials and other short courses ("short courses") should be considered as part of the educational policy continuum at all levels, a priority to create a system that is efficient and not onerous on the education providers and regulators is indicated. An inherent separation exists between non-award and award micro credentials and short courses due to differing regulatory requirements. If a student completes a micro credential, which can contribute to a credit transfer to a more traditional degree/diploma etc., then it is important there is an accountable and transparent acceptance of a quality educational program. The completion of an appropriate assessment at the required AQF level, which links to a number of short courses, as a formal requirement to recognise aggregated micro credentials.

2. The application of enterprise and social skills is dependent on context

We support the approach of specifying some social and enterprise skills in the AQF qualifications through teaching, assessing and reporting these within the core content. This is a complex topic and the list of these skills outlined in the discussion paper in Table 1 are broad.   Torrens University and Think Education utlilise their own enterprise and social skills tool called Laureate Professional Assessment (LPA). The attributes that formed part of the final LPA covered most of the skills outlined in table 1 including items such as empathy.   This tool has been developed globally by our parent organisation Laureate International and involved 25,000 participants in development.   The final version was then piloted with 11,000 students, 22 institutions, 19 countries with 7 languages. We are now successfully rolling out this instrument with a number of our business and hospitality programs.

These skills should also be developed in the context of the changing/ disruptive nature of enterprise. There would be a need to expand the list of enterprise and social skills included in the AQF and provide guidance or advice about delivering them through various qualifications (but do not include these skills as a taxonomy). AQF should also create a framework for employability/graduate learning attributes that is a continuing of breadth and experience.

3. Remove duplication of descriptors

We would strongly support this change.

4. Recognising the value of VET and Higher Education

Being a dual-sector University, we support the inclusion of VET and HE qualifications to maximise student mobility through the various AQF levels. One of the unintended consequences of the changes to the Federal government is funding of VET courses (VET FEE HELP), a number of providers have actively encouraged students to move

from VET qualifications into higher education courses particularly in areas such as business and IT.   This has further weakened an already struggling VET sector in terms of funding and potentially affecting its quality thereby possibly undermining the AQF more broadly. It is accepted that the relationship between VET and HE qualifications is not linear and that both are actually complementary with people moving backward and forwards depending on their workforce and personal needs.

5. Revise descriptors to improve clarity

The revision of the descriptors to simplify them and ensure clear distinctions between levels is vital. We support this change, as it will help us significantly in our accreditation and quality assurance processes.

6. The AQF could better reflect the SSCE's role

There has been discussion on revising the SSCE descriptor to recognise that the knowledge and skills acquired in the SSCE can be at a broad range of AQF levels and result in multiple pathways. We support this initiative, as this will promote greater access and pathways for student completing SSCE. This will also encourage, foster and recognise high quality curriculum and student achievements within our schools.

7. An AQF reference credit point system

We support the changes of volume of learning unit of measurement from year to hours. This change will ensure greater flexibility in terms of teaching and learning practices from both a student and institutional perspectives.   A move to an hour-based credit point system within the AQF will significantly promote a common understanding, consistency and expectation on 'volume of learning' across the tertiary education sector.

8. Possible ways forward for Pathways Policy

We support the move to ultimately grant the primary responsibility for providing pathways to the providers; however, a pathway policy guidance should be maintained to promote and maximise recognition of prior learning.

Whilst developing a shared credit transfer register is a good suggestion; however, maintaining such a register is likely to be cumbersome due to the number of tertiary providers, multiple qualifications and new and retired qualifications. Individual institutions may want to have their own register; however, a sector-wide approach may be difficult to achieve and potentially will increase compliance costs.

9. AQF Qualifications Issuance Policy

We support removing these as they are already covered under RTO Standards and the HESF.

10. Principles and Processes for the Alignment of the AQF with International Qualifications Frameworks

We support removal from the AQF the Principles and Processes for the Alignment of the AQF with International Qualifications Frameworks and retain them as a Department of Education and Training Policy. This would ensure greater recognition and support for the internationalisation of Australian education sector.

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.

At the recent AQF consultation meetings, the Panel expressed the view that AQF levels should be used only to define application of knowledge and skills and linked formally to a description of the type of qualification. We are supportive of this approach, especially in the pursuit of greater transparency and more explicit guidelines on what the minimum knowledge and skills a graduate should have at an AQF level.

One of the areas that we have already discussed above is the importance of valuing equally VET and Higher Education. The discussion paper outlines many people with VET trade qualifications (AQF level 3) and Diploma/Advance Diploma (AQF 5 and 6) work with higher levels of responsibility than people with Bachelor and Masters degrees (AQF 7 and above).   As a way to really value these people with VET qualification backgrounds and the higher level of responsibility we would like consideration of a "technical masters /master craftsman" (AQF 9) being established.

Other