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

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Respondent organisation (where relevant)

Council of Academic Public Health Institutions Australasia (CAPHIA)

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

The Council of Academic Public Health Institutions Australasia (CAPHIA) is the peak organisation that represents institutions which teach and research public health. Virtually all universities that teach and research public health in Australia and New Zealand are members. Its purpose is to maintain high quality academic standards in the education and development of public health practitioners and researchers, to lead and represent public health education in the tertiary sector and to be a respected voice and advocate for the development of public health professionals and researchers within Australasia. CAPHIA aims to strengthen links between universities, public health professionals and industry to support a workforce equipped to address the public health challenges facing Australasia. As the Australian Qualifications Framework (AQF) provides guidelines which define and regulate the core business of the substantial majority of CAPHIA's members, CAPHIA has a vital interest in the structure and content of the AQF.

CAPHIA considers the AQF fit for purpose and recognises it as an appropriate framework for regulation. The AQF has set the standards for a successful higher education sector which is now Australia's third largest export. The Australian higher education sector is estimated to have added over $20 billion to Australia's export income in 2017, with the VET (Vocational Education and Training) sector adding another $5 billion[1]. The higher education sector is also an important Australian employer. Universities Australia estimates that the university sector directly employed over 120,000 staff in 2016[2].

Furthermore, the Australian higher education sector continues to grow and achieve new targets. There was a 14% increase in international student numbers between 2016 and 2017[3], with the proportion of Australia's international students who chose Australia as their first preference destination rising from 70% in 2012 to 76% in 2017[4]. Australian higher education is also increasingly meeting domestic goals of national importance, including Indigenous education. Universities Australia estimates that from 2008 to 2016, there was an 89% increase in enrolments of Aboriginal and Torres Strait Islander undergraduate students. There was also a 55% increase in undergraduate enrolments of students from low socioeconomic backgrounds[5].

These continuing achievements indicate that the current AQF appropriately defines and structures the Australian higher education sector in general terms. With this in mind, CAPHIA recommends some minor and incremental improvements to the AQF, with the goal of continuing to protect and strengthen the international reputation of the Australian higher education sector into the future.

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.

One way in which the AQF could improve in its fitness for purpose is by enhancing the precision of its descriptions of different educational levels. The standards set by the AQF for each educational level provide a crucial safeguard for the quality of the Australian higher education system. Without this, prospective employers of Australian graduates and prospective students may lose confidence that an Australian qualification is a guarantee of an appropriate set of knowledge and skills. CAPHIA recommends that these descriptions of each educational level be made more detailed, clear and precise to protect the common good of a strong reputation for the higher education sector, both nationally and

[1] Department of Education and Training. Research Snapshot: Export income to Australia from international education activity in 2017. 2018. Available from < https://internationaleducation.gov.au/research/Research-Snapshots/Documents/Export%20Income%20CY%202017.pdf>

[2] Universities Australia. Data Snapshot 2018: Australia has one of the best education systems in the world. 2018. Available from <https://www.universitiesaustralia.edu.au/.../Data%20snapshot%202018%20web.pdf>

[3] ICEF Monitor. Australian education exports approaching AUS $29 billion. 2017. Available from <http://monitor.icef.com/2017/10/australian-education-exports-approaching-aus29-billion/>

[4] ICEF Monitor. Australia's international education exports grew by 22% in 2017. 2018. Available from <http://monitor.icef.com/2018/04/australias-international-education-exports-grew-22-2017/>

[5] Universities Australia. Data Snapshot 2018: Australia has one of the best education systems in the world. 2018. Available from <https://www.universitiesaustralia.edu.au/.../Data%20snapshot%202018%20web.pdf>

internationally.

The current descriptors of each AQF level may add to confusion, especially the use of the conjunction 'and/or'. For example the current AQF states that: 'Graduates of a Masters Degree (Extended) will demonstrate the application of knowledge and skills: … to plan and execute a substantial research based project, capstone experience and/or professionally focused project'[6]. This leaves considerable ambiguity about the minimum quantity and quality of output which is required from students of Masters' (Extended) programs. As suggested in the Discussion Paper for this review, CAPHIA recommends expanding the glossary of terms, and emphasising the differences between levels rather than similarities[7]. For example, the Panel may consider adding terminology from Blooms' Taxonomy in the AQF to assist in differentiating between higher levels of competency. This additional clarity will provide a stronger standard to ensure the quality, reliability and reputation of Australian higher education qualifications.

CAPHIA recommends that descriptions distinguishing education levels be made clearer and more detailed to protect educational quality and reputation. As an example of this, the three types of qualifications which meet the standards for AQF level 9 (coursework, research, and extended Masters' degrees) have very similar skills and outcomes described by the AQF standards, despite the fact that a Coursework Masters' degree typically lasts for 1-2 years and an Extended Masters' degree for 3-4 years[8]. Assuming that a Master's degree of one year and a Master's degree of four years have different learning outcomes, the substantial differences between these three types of Master's degrees could be more clearly captured by the AQF standards.

CAPHIA supports the continued inclusion of a volume of learning (as defined by a number of hours), in addition to specified competencies for each level in the AQF. Specifying a number of hours of learning required for each AQF level provides an important benchmark for prospective employers and students to differentiate between qualifications. It also provides a valuable common reference for higher education providers in regard to what each AQF level looks like in practice. The Discussion Paper itself makes reference to a number of education providers offering shorter courses in response to employer or student demand, rather than being motivated to provide the most appropriate learning methods or to meet students' educational needs. The practice of offering shorter courses in response to external pressures seems likely to result in the erosion of educational standards and the Australian higher education sector's international reputation for quality. As such, the continued inclusion of the temporal volume of learning for each AQF level provides a mechanism to protect and appropriately define educational standards and qualifications.

[6] Australian Qualifications Framework Council. Australian Qualifications Framework, Second Edition. 2013. Available from <https://www.aqf.edu.au/sites/aqf/files/aqf-2nd-edition-january-2013.pdf>

[7] Australian Qualifications Framework Review Panel. Review of the Australian Qualifications Framework: Discussion Paper. 2019. Available from <https://docs.education.gov.au/system/files/doc/other/aqfrdiscussionpaper_0.pdf>

[8] Australian Qualifications Framework Council. Australian Qualifications Framework, Second Edition. 2013. Available from <https://www.aqf.edu.au/sites/aqf/files/aqf-2nd-edition-january-2013.pdf>

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.

One of the approaches considered in the Discussion Paper is whether the current AQF should be expanded to include 'microcredentials'. Examples of microcredentials include short online courses, foundational or enabling courses, and professional courses (such as finance or information technology courses).

CAPHIA would support the expansion of the AQF to include microcredentials only under certain conditions. Microcredentials can be significantly different in content and structure from the majority of university and VET qualifications currently classified in the AQF. Inappropriate or hasty inclusion of microcredentials into the AQF risks undermining the credibility of the AQF and the reputation of the Australian higher education sector.

If microcredentials are included in the AQF, CAPHIA recommends that the AQF expands to create a new set of categories to classify microcredentials, similar to the way that the VET sector can offer Certificate 1-4 qualifications, rather than offering Bachelors and Masters degrees. It would be misleading and inappropriate to classify microcredentials within the existing categories, for example as an AQF Level 1 qualification. In the future, microcredentials may vary considerably as to the level of pre-existing required knowledge of students, an aspect which is incompletely captured in the existing AQF Level descriptors. For example, a microcredential on preventing antimicrobial resistance may be very different in content and scope if the students in the course are already experienced medical doctors, as compared to a microcredential on the same topic, but aimed at agricultural workers with limited prior medical knowledge and more straightforward responsibilities in this area.

One way in which microcredentials could be clearly and accurately classified is by specifying both the approximate level of prior knowledge assumed and the volume of learning required for each microcredential. For example, a microcredential which assumes a level of prior knowledge consistent with undertaking a postgraduate degree, but has a relatively short course duration might be classified as a microcredential P1. The complexity of content would be similar to a degree taught at AQF level 9, and such degrees might include microcredentials classified as 'P' level. In contrast, a microcredential which assumes a level of prior knowledge consistent with undertaking an undergraduate degree, but has a much longer course duration could be classified as a microcredential U6. Undergraduate degrees might therefore include microcredentials at the 'U' level. Microcredentials at the VET level could be distinguished by an initial 'V'. Individual universities may choose to include microcredentials as part of their articulation pathways towards entry into undergraduate or postgraduate courses.

Accrediting a microcredential should be commensurate with the relevant AQF level, so that whatever is required at a course level for an AQF level 9 should also be relevant at a unit, or microcredential, level. The particulars of the proposed V, U and P classification scheme are less important than the principle that it should be easy to distinguish microcredentials with varying levels of content complexity. This will help inform potential students and employers, and help guide educators.

In making these classificatory decisions, the Panel should also consider how microcredentials are likely to interact with current systems of continuing professional education. Many health care professionals, such as doctors and psychologists, are required to complete a certain volume of training each year, in order to make sure their knowledge and skills are up to date and so they can remain eligible for professional registration. It would be valuable for any classification of microcredentials to be harmonised with existing systems of professional education to ensure appropriate recognition of skills gained in these courses. In this way, the complexity and volume of learning provided by each microcredential would be clearer to higher education providers, professional accrediting organisations, prospective students, and employers, allowing them to make more informed decisions. This harmonisation would have the further benefit of developing stronger connections between universities, industry and professionals, enabling greater consistency of professional training across Australia. These stronger connections would provide greater opportunities for universities to benchmark their credentials against the needs of employers and would enhance the employment options for graduates of Australian universities.

CAPHIA would also advise the Panel to be cautious in registering new institutions as accredited providers of microcredentials. As an example of the damage that can be caused by looser regulations, there is evidence that previous deregulation of the VET sector opened up opportunities for unscrupulous training providers. Some companies were able to register as training providers, receive thousands of dollars of government-supported loans and subsidies, and then provide courses of substandard quality which most enrolled students would not be able to complete[9]. While subsequent regulations have curbed this type of dishonest and exploitative conduct, incidents such as these cause lasting harm to the entire education and training sector. To avoid similar problems with the introduction of microcredentials, these new qualifications should be offered by institutions which have a reputation for quality and integrity.

This is especially important in the initial phases of any introduction of microcredentials. It would be advisable to allow only organisations registered as universities to offer microcredentials until standards are set in practice as well as in documentation. To maintain quality, microcredentials at the U or P classification should at no time be offered by institutions other than those registered as universities. Microcredentials which have content as complex as that offered in degrees at AQF levels 6 and above should be offered only by universities.

In regard to other approaches suggested in the Discussion Paper, CAPHIA would advise the panel *not* to implement changes to the AQF to certify social and enterprise skills. While effective social skills are sought after by employers and are important for workplace success, this does not mean that the development and acquisition of these skills is an appropriate area for the AQF to define and regulate. Many social and enterprise skills are difficult to accurately and objectively assess, especially across different academic disciplines and situations. Many of the suggested skills are valued differently across

[9] Mary Leahy. Reforming vocational education: it's time to end the exploitation of vulnerable people. 2015. Available from <https://theconversation.com/reforming-vocational-education-its-time-to-end-the-exploitation-of-vulnerable-people-51396>

cultures, and the appropriate expression of these skills varies significantly with cultural and linguistic context. Including social and enterprise skills in the AQF, especially in Australia's diverse and multicultural society, is likely to result in highly subjective and variable standards for assessing these skills. This, in CAPHIA's view, may cause substantial reputational damage to the AQF and the Australian higher educational sector, damage that may be difficult to repair. CAPHIA recommends that any changes to the AQF be made cautiously and incrementally, with due regard to the importance of safeguarding the reputation of Australian higher education.

CAPHIA supports the introduction of a credit points system. We recognise the benefits that a credit points system may have in enabling easier comparisons between Australian and international qualifications, potentially enabling enhanced career pathways for graduates of Australian institutions. However, we recommend that at this time, the credit points system should be optional, until it is easier to determine how much additional regulatory burden the adoption of the credit points system would place on higher education providers.

Other

CAPHIA would like to thank the Minister of Education for the opportunity to comment on the review of the Australian Qualifications Framework. We wish the Panel every success in the process of reviewing this valuable Framework.