Review of the Australian Qualifications Framework

Discussion Paper   DECEMBER 2018

The Australian Qualifications Framework (AQF) Review Panel wishes to draw on the considerable expertise and experience that has developed across a broad range of organisations and individuals in relation to the Review's Terms of Reference.

In its discussion paper, the Panel has opted to provide to organisations and individuals some of the Panel's initial thinking about the case for change to the AQF, but invites differing analysis, conclusions and proposals.

To make a submission to the Review, please email this form to AQFReview@education.gov.au **by 15 March 2019**.

Please note that the Australian Government Department of Education and Training will not treat a submission as confidential unless requested that the whole submission, or part of the submission, be treated as such.

Please limit your response to no more than 3000 words.

Respondent name

Professor Peter Rathjen, Vice-Chancellor and President

Respondent organisation (where relevant)

University of Adelaide

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

General comments
The University supports the observations about the contextual issues identified for the Review including the increased emphasis on enterprise and social skills, the rise in prominence of shorter form credentials, whilst at the same time acknowledging the continuing importance of recognised qualifications or credentials for enhanced employability. We agree the wider range of possible ways to acquire and evidence new knowledge and skills (e.g. via digital badges and open online courses) demands a response from the qualification framework to ensure that it remains current and relevant to the nature of 21st century employment. A consistent and well accepted method for assuring the quality of learning would assist students and employers to recognise high quality credentials and institutions to differentiate their offerings in an increasingly crowded education marketplace.

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.

Credential types

The University supports the inclusion of modular and stackable credentials to be incorporated into the AQF in order to make their relationship to existing Australian qualifications transparent. In particular, including short-form (micro)credentials as an AQF credential type that can be aggregated and related to a major qualification seems to be a proven model. Consideration should also be given to grouping shorter form credentials according to their purpose including preparation for work, preparation for, or extension of, major awards, etc, To this end, the University supports the approaches proposed in 4.1 of the Discussion Paper.

Generic skills

The AQF currently sets out certain non-discipline specific generic skills that students can acquire through learning and states that application of these generic skills is specific to the education or training sector. It would be logical to review the current limited definition of generic skills in the AQF and replace these with a contemporary range of enterprise and social skills. For example, the ability to communicate in English orally and in writing within various contexts: academic, professional and social. English language proficiency is not confined to English language learning and communication skills but extends to academic literacy including discipline-specific professional discourse. The development of English language proficiency for, and by, all students is essential for successful student transition into University, retention, and transition to employment.

Therefore the list of social and enterprise skills should be expanded but not included as a taxonomy as these are often gained in the context of each discipline, and where they can be taught and assessed appropriately dependent on the type of skill. The University agrees that social and enterprise skills relate more to qualifications in the same fields of study rather than to the sector in which they are delivered. Also we would like to note that the skills listed in the review are already captured in other documents such as the national Threshold Learning Outcomes for certain disciplines. However, the University supports the approaches outlined in 4.2 of the Discussion Paper. Overall we believe that a system which can make transparent for students and explicit for employers the skills that students have developed through their learning would be beneficial. A system that supports the teaching and assessment of social and enterprise skills in a valid and reliable way may also assist institutions seeking to embed such skill development into curriculum.

The AQF taxonomy

The AQF uses a taxonomy that groups qualifications by level. Each level has a criteria that is intended to provide an indication of the relative complexity and/or depth of achievement and the autonomy required to demonstrate that achievement. In practice, although the application of knowledge and skills varies across the qualifications types, they do not intrinsically increase in complexity nor in the autonomy required to demonstrate that achievement. The clearest example is a Level 7, four year Bachelor, such as a Bachelor of Laws, compared to a Level 8 Graduate Certificate. At the centre of a Bachelor of Laws, students learn concepts, procedures and reasoning underpinning the Australian legal system. Additionally students are required to undertake extensive study in elective law courses that provide an opportunity both to broaden their legal knowledge and specialise in areas such as criminal law, family law, labour and industrial relations law, etc. A Bachelor of Laws is a recognised professional qualification and includes prerequisite studies to prepare students for admission to practice as a barrister or solicitor. In contrast, a Graduate Certificate is normally completed in six months and can be either an extension or a conversion degree. It is clear the volume of learning for a Graduate Certificate can't deliver the complexity or depth of achievement of many Bachelor degrees; particularly if it is a conversion degree. This is also a consideration for qualifications of the same level, such as at Level 8; a Bachelor Honours year is generally accepted to be significantly more complex than a conversion Graduate Certificate. Therefore, when considering the inclusion of additional credentials, in particular short form credentials, effort should be taken not to compound the existing inconsistencies of the AQF levels.

The University supports the approaches listed in section 4.3 of the Discussion Paper. In particular it supports the need to revise descriptors to simplify them and ensure clear distinctions between levels, and that this might best be achieved through emphasising the differences between levels rather than similarities.

Volume of learning
The University suggests that the quality and relevance of learning gained is of greater importantance than the amount of time spent. Using time to indicate the volume of learning is useful if it truly equates with the achievement of competency. That said, years of study may be an inadequate measure of depth and breadth of learning outcomes and hours of study might be a more reliable measure for the volume of learning. We support a credit point system, either optional or uniformally applied across the sector, which would increase transparency of qualifications by providing a common baseline between educational providers and help with the recognition of prior learning. It could also help locate new shorter form credentials within the AQF. The University supports adoption of a system that facilitates the recognition of new types of learning (such as microcredentials) and provides maximum portability of qualifications for students given the changing nature of work, emphasis on employment and an expansion of borderless education facilitated by cloud and virtual exchange.

3. In relation to approaches suggested by the Panel or proposed in submissions or through consultations, what are the major implementation issues the Review should consider? Please consider regulatory and other impacts.

The wider range of possible ways to acquire and evidence new knowledge and skills (e.g. via digital badges and open online courses) requires a consistent method for assuring the quality of learning and therefore may require changes to the HESF, the RTO standards as well as a range of academic policies and student services internal to various providers of higher education. The significant level of resources to implement such changes should not be underestimated. Similarly, national funding, governance systems and legislation relevant to national and international education would need to be re-examined. As Australia's third largest export and largest service export, any transition to a more coherent tertiary education system should take into consideration the short and medium term impact on international education as well as the longer term impact in establishing Australia as an education leader globally.