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

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Respondent organisation (where relevant)

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

The AQF has created a solid framework which provides an overview of the training and qualification environment in Australia that is reasonably comparable with similar reputable qualification frameworks of other countries/regions. Its current focus is on qualifications and the level of those qualifications relative to other qualifications.

To this extent it has been fit for its intended purpose. It has provided a strong and developing understanding of the connection between the education sectors.

As we move deeper into the current Century and one characterised by transformative societal and enterprise disruptive change it is becoming less fit for purpose. Particularly when engaging with the cross over between school, vocational and higher education sectors and with those elements considered out of scope of this review, these being industry, external professional and occupational qualification, and professional and theoretical content attained through a life long journey.

There is an urgency to provide a framework that more seamlessly integrates movement between the sectors, supports a diversity of high quality learning enterprise, and enables micro-credentialing and the rigor of professional and theoretical content attained through enterprise to be better acknowledged across qualification levels.

Noting that the movement is not always in one direction, with many already degree qualified people wanting to complete vocational type course to supplement their experience and qualifications. Noting also that other people, who have tirelessly contributed to their profession, are wanting for this learning to be more readily formally recognised to support career changes. In this sense reverse articulation also needs to be explored in the framework as do new models of better recognition of prior learning across all AQF levels.

The discussion paper recognises that there is currently no real acknowledgement for micro credentials and enterprise and social skills. While presenting many challenges and complexity, the inclusion of these elements is vital for the continued development of the framework.

In the case of micro credentials and social and enterprise skills the reality is that most providers are looking at ways to integrate these into their undergraduate programs in an RPL approach. Many people young and old have developed these skills which actually make them valued employees and managers and yet their skills are not formally recognised because they don't fit into the current framework. That being said it is a very complex issue in terms of determining the level and value of such skills especially when linking them to short courses or to qualifications.

The question of different regulatory bodies is noted in the discussion paper. The need for separate bodies overseeing the different sectors of education and training seems sensible given the size, complexity and nuances of each sector. One body overseeing all sectors may not result in the depth required to regulate each sector. That being said there seems at times a dislocation between the regulatory bodies and some stronger linking between the bodies needs to be explored.

In reference to enabling and Foundation programs, the current framework is not fit for purpose. These courses, which in the case of Foundation courses are quality assured under government approved standards and accredited by an authority authorised under legislation are not recognised in the framework. Given that many of these courses are full time face to face course of a minimum of 26 weeks or more in length they can hardly be described as short courses. The link of Foundation courses to HSC equivalence needs to be reviewed as the equivalence is really about access to undergraduate degrees not the actual content of the course which often prepares students far better for higher education study than the HSC which as stated is really about access to, not preparation for post-secondary student life.

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.

Possible approaches for inclusion of wider range of credentials

As indicated above, there is an urgent need for looking to new models for recognising learning outcomes attained through professional experience and learning outcomes attained through the micro credentials, not only as shorter forms of credentials but also in terms of contributing to a larger qualification and the specific content of credential, be it diploma to doctorate level.

In reality some institutions are doing this in some way already. A lack of recognition in the framework will see a huge variety of response approaches and in some cases poorly thought through responses and potential blurring of levels within the framework. There needs to be some guidance or regulation to the process whereby professional experience and micro credentials can be authoritatively recognised with a level of their worth in terms of contributing to a larger qualification and the specific content of that qualification across the AQF levels.

Possible approaches for specification of societal and enterprise skills in qualification generic outcomes

The questions in the discussion paper on approaches for specification of societal and enterprise skills of wider range of credentials are noted and the suggested approaches seem logical and sensible. Care needs to be taken in ensuring their specification is proportionate to the differing credential types and levels and also supports the diversity of community, industry, professional, and discipline needs, expectations and requirements so these generic skills may reasonably be capable of application across the sector.

Revision of AQF taxonomy, particularly application of knowledge and skills

The discussion paper presents a firm rationale for reviewing the knowledge and skills domain of the AQF taxonomy. As above, care needs to be taken in ensuring their specification is proportionate to the differing credential types and levels and also supports the diversity of community, industry, professional and discipline needs, expectations and requirements so these outcomes may reasonably be capable of application across the 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.

The need to ensure a level of quality and consistency, while supporting innovation, across institutions and indeed within institutions, when developing processes to integrate or recognise learning outcomes attained through professional experience or learning outcomes attained through the micro credentials, is urgent. Not only with

respect to shorter forms of credentials, but also in terms of contributing to a larger qualification and the specific content of credential across the AQF levels.

As many providers are already looking at how to integrate micro credentials the development of a good practice guide would be useful. In addition, the involvement of key industry and professional bodies as part of this process development would be vital. Many providers are required to involve industry bodies in the development of their degree programs in order to increase graduate attributes and currency of content. They would be of real assistance in guiding many of the level or values of short courses in their industry.

As above, care needs to be taken in ensuring any changes to the AQF are proportionate to the differing credential types and levels and also support the diversity of community, industry and professional needs, expectations and requirements so the next iteration of the AQF may reasonably be capable of fair, unburdening and value adding application across the sector.

Other

The next iteration of the Framework needs to recognise and support a diverse, globalised and connected learning community.

Foundation Programs

In relation to the Foundation Program there needs to be a recognition of the qualification and where it fits in the framework. Currently Foundation programs are offered to mostly international students however domestic students also access these programs. The placement of these courses in relation to HSC for domestic students needs to be clearly outlined in order to avoid an undermining of the HSC.

It is noted that while the HSC is part of the AQF it is not linked to a level. Perhaps this needs to be the same approach in terms of the Foundation Programs. The inclusion of Foundation courses into the framework needs to be seen in the light of the current regulatory processes that are in place. Further regulatory constraints should not be added as a result of their inclusion.

ELICOS, Bridging, and Professional Year Programs

As for Foundation Programs there needs be recognition of the roles of these credential types in the framework.

AQF levels, volume of learning and course duration

The current AQF specifications relating to course duration / volume of learning are ambiguous. There is a need to acknowledge that course duration and volume of learning may vary significantly among courses of similar AQF level, including those of similar award name, due to a many factors, e.g. the proficiency of the learner on course entry and innovation in course learning, teaching and assessment methodology. In

making this acknowledgment there is also a need for guidance on its application to ensure the comparability of learning outcomes of credentials within AQF level is maintained.

Glossary

Some definitions in the Glossary appear to be too narrow. For instance:

Competency-based training has been limited to an industry standard linked to workplace expectations. The rational for this constraint is unclear.

Credit could be extended to include recognition of micro credentials and/or enterprise and/or social skills.

Credit transfer could be extended to also have applicability to micro credentials.

Reflective of the need to recognise the place of Foundation Programs and ELICOS programs in the framework, associated definitions are also required.

Concluding comment

SGA would be interested in and looks forward to the next iteration of the AQF and the related details of its intended implementation process, including timeframes, once this becomes available.