ACT GOVERNMENT RESPONSE TO
THE REVIEW OF THE AUSTRALIAN QUALIFICATIONS FRAMEWORK DISCUSSION PAPER

1. IN WHAT WAYS IS THE AQF FIT, OR NOT, FOR PURPOSE?

As one of the pillars that underpins Australia's education system, the AQF effectively describes and differentiates between the wide array of qualifications on offer. However, it does fall short in a number of key areas. These are identified below and discussed in more detail in the responses to questions 2 and 3.

It is acknowledged that some key concepts and assumptions underpinning the AQF have not been expressly discussed in any of the papers produced thus far. Specifically, qualifications must be treated as being more than just the sum of their parts. Part of this assumption is that a qualification represents a value-added proposition. As such, not all units or courses it contains will be at its AQF level. For instance, the first semester courses of a bachelor degree (AQF level 7) will not be at the same level as the courses in the last semester. Rather, learning is based on the hierarchical complexity of learners' understanding of a subject[1].

1.1. A CLEAR ARTICULATION OF THE PURPOSE OF QUALIFICATIONS

There is strong evidence that a tertiary qualification has become the norm for young Australians: fewer people enter the labour market without at least a Certificate III[2]. The choice to undertake a qualification is consistent with Australia's labour market profile, which predicts substantially more growth in jobs requiring at least a Certificate III[3].

Because of their growing prevalence, there should be a clear understanding of the (sometimes multiple) purposes of qualifications in the AQF. A considerable amount of work has been done in this area, most notably a project published in 2015 by the NCVER--entitled *Vocations*--which articulates the multiple purposes of qualifications as:

- providing entry to or progression into the labour market
- moving to higher-level studies within education
- contributing to social inclusion and social mobility in society[4]

These purposes are articulated to some extent in the AQF, however could be more clearly described in the level and qualification type descriptors. This would allow qualification developers to create products that are more consistent with the defined purposes, and enable users to better understand the instrumental value of the qualification they hold. Some possible approaches to achieving this are described in 2.1 below.

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[1] Biggs, J B & K F Collis. 1982. Evaluating the quality of learning: the SOLO taxonomy. New York: Academic Press.
[2] Business Council of Australia. 2017. Future-Proof: Protecting Australians through Education and Skills.
http://legacy.bca.com.au/publications/future-proof-protecting-australians-through-education-and-skills.
[3] Department of Jobs and Small Business. Labour Market Information Portal. Employment projections to 2022.
http://lmip.gov.au/default.aspx?LMIP/GainInsights/EmploymentProjections
[4] Wheelahan, L et al. 2015. Linking qualifications and the labour market through capabilities and vocational streams. Adelaide: NCVER.

1.2. LACK OF CONSISTENT UNDERSTANDING OF THE NATURE OF VET QUALIFICATIONS, AND A COMMENSURATE INABILITY TO CONSISTENTLY BENCHMARK/ASSESS THEM AGAINST THE AQF

There are two major issues that prevent consistent mapping of qualifications to the AQF. The first is a by-product of training product review and development processes; the second relates to misconceptions around the workplace autonomy of graduates, and the commensurate challenge of articulating knowledge, skills and the application of knowledge and skills consistently, both between the VET and higher education sectors, and across the different occupational areas of the VET sector.

These inconsistencies are most notable with trade qualifications, which are mapped to a Certificate III, but whose holders have considerable skill, autonomy and responsibility, and the underpinning knowledge necessary to perform effectively and responsibly in a professional setting. When compared to the workplace expectations of non-trade VET qualifications, the holder of a trade qualification will be required to perform at a considerably higher level. This remains the case when comparing a qualified tradesperson to a newly-graduated holder of a bachelor degree. Whereas the latter would almost always work under direct supervision with limited autonomy, the former is a qualified professional, able to practice in a variety of contexts and with limited supervision.

These inconsistencies likely stem from the two fundamentally different sets of assumptions that underpin VET and higher education qualifications. Whereas higher education qualifications emphasise key inputs and activities of the educational process, including underpinning knowledge and curriculum, VET qualifications are based on a narrowly-defined set of workplace performance objectives, and largely ignore both the educational process and the knowledge that necessitates their achievement. This misunderstanding ultimately contributes to VET qualification outcomes being expressed at a lower level than those for higher education qualifications.

Across VET qualifications, narrowly defined competencies and workplace autonomy are their primary defining characteristics. It is therefore possible to have a Certificate III in a field such as Call Centre Operations mapped to the same AQF level as a trade qualification, such as electrician. Whereas the former can complete the qualification in a matter of months if not weeks, the latter spends three to four years, including a substantial amount of time in the workplace. Moreover, the amount of knowledge that underpins the respective qualifications varies vastly, as does the degree of skill, and how that knowledge and skill are applied. However, because the ultimate determinant of AQF level in VET qualifications appears to be workplace autonomy, the two are mapped to the same level.

1.3. INABILITY TO INCLUDE MICRO-CREDENTIALS AND OTHER SUB-QUALIFICATION ELEMENTS

As the discussion paper points out, the current AQF does not allow for the inclusion of sub-qualification units. It is recommended that they should not be integrated before identifying and articulating the range of potential issues and consequences.

Further to the range of qualifications' purposes identified in 1.1 above, it would be helpful to understand the multiple forms and purposes of micro-credentials and other sub-qualification elements.

1.3.1. Unclear definition of what a micro-credential and other typologies of sub-qualification elements are and why they should be included in the AQF

The discussion papers provide an overview of the different forms 'micro-credentials' may take, however the precise typological differences between them remain unclear. Once this differentiation has been made, it would be easier to make a determination as to how desirable it would be to include each type in the AQF. Considerations could include employer- and supplier-driven factors, such as

upskilling and 'badging', access and equity, funding consideration for government subsidies and broader workforce development.

Consideration could also be given to how Certificate I and II qualifications, given their limited labour market outcomes, would be classified as 'enabling and foundational courses'. This question stems from the observation in that VET in schools—where a large proportion of these qualifications are delivered--should 'provide foundational preparation for entry to mid-level qualifications and employment-based learning, such as apprenticeships'[5] .

1.3.2.   *The extent to which micro-credentials could be combined to form a full qualification*

One of the major challenges of a wholesale integration and inclusion of micro-credentials into the AQF is the assumption that a number of them could be grouped together to form a full qualification. Such an approach risks undermining qualification design by ignoring the inherent concept of hierarchical complexity and minimising the importance of the learning process.

Thus, if micro-credentials are to be included in the AQF, it is critical that there be an agreed understanding of their purpose(s) and, unless otherwise indicated, they should be seen as standalone elements that *may* be part of full qualifications.

1.4.   *INCLUSION OF BROADER, 'SOCIAL AND ENTERPRISE' SKILLS*

Based on the ACT Government's engagement with local employers, as well as the growing body of research on the need for workers with 'social and enterprise skills' (or equivalent), it would be beneficial to include these skills in the AQF in a way that is meaningful for employers. A possible approach for including or referencing them in the AQF is presented in 2.4 below.

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[5] Wheelahan, L et al. 2015. Linking qualifications and the labour market through capabilities and vocational streams. Adelaide: NCVER. (p.26)

2. WHERE THE AQF IS NOT FIT FOR PURPOSE, WHAT REFORMS SHOULD BE MADE TO IT, AND WHAT ARE THE MOST URGENT PRIORITIES?

2.1. PURPOSE OF QUALIFICATIONS

The articulation of 'the purpose' of qualifications is currently expressed at a high level. While this is enabling in one sense, it is recommended that additional detail be built into the statements of purpose. Ideally this would incorporate empirically derived evidence, including graduate outcomes and destinations. 'Purpose' could then be articulated along the dimensions presented above with a greater degree of specificity. This would allow for a deeper and multifaceted understanding of qualifications and the reasons learners undertake them, and ensure that qualification designers and other users of the AQF have a sound understanding of these purposes.

Consideration could be given to changing to the visual representation of the AQF to more accurately reflect relationships on several levels. The fan used to represent Irish qualifications seems both more plausible, and more easily understandable, particularly with the inclusion of provider types/sectors delivering the qualification. Such a representation could also allow for inclusion of sub-qualification elements, assuming these are adequately defined and definitions agreed.

2.2. A CONSISTENT, PRINCIPLE-BASED APPROACH TO MAPPING QUALIFICATIONS TO THE AQF

Mapping qualifications to the AQF—particularly in the VET sector—is undertaken separately by each Industry Reference Committee, and therefore does not look across disciplines or fields of education. The establishment of the AISC has thus far not been able to articulate a series of nationally consistent benchmarks for VET qualifications at different AQF levels.

As noted in the *Review of the AQF Discussion Paper*, 'in the VET sector, volume of learning is seen as contrary to competency-based training'. The Discussion Paper also notes that volume of learning describes an input rather than an output. A similar argument could be made for traditional credit point systems, which do little to account for the recursive nature of learning and the increasing complexity of knowledge and skills as the learner progresses through their learning journey.

The introduction of a credit matrix[6] system, as referenced in a 2010 ILO publication,[7] may help to resolve this issue:

> *Having a taxonomy learning across three domains (knowledge and skills; their application; and degree of independence), levels, and points for the amount of learning involved*
>
> - *being able to encompass all tertiary education sectors*
> - *operating at the level of subjects or modules, rather than whole qualifications*
> - *facilitating credit pathways and transfer between qualifications*
> - *applying to all subjects within a qualification.*

A clearer articulation in the AQF of knowledge, skills and application[8], in combination with a system for weighting credits would also enable a process for validating training package competencies

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[6] A credit matrix was described and piloted in 2003-06 in Victoria (VQA. 2004. The Credit Matrix – Towards Implementation). The complexity of the proposed approach could likely be addressed much more effectively at present (than 15 year ago) with the technological and computing tools currently available.
[7] Wheelahan, L. 2010. From old to new: the Australian qualifications framework. International Labour Office, Skills and Employability Department. Geneva: ILO.
[8] Greater specificity can be found, for example in the 1998 edition of the AQF.

against the AQF descriptors, and in turn, for validating curriculum (design, delivery and assessments) against the competencies.

The introduction of such a system, which would express a range of values for different AQF levels, would allow the current definition of 'volume of learning' to be phased out and would allow for the variation in learning across disciplines, industry sectors and learner cohorts. It would similarly be able to account for ASQA's proposal to use volume of learning to account for *new* rather than *typical* learners. Finally, it would give providers greater flexibility, whilst removing an unnecessary degree of regulatory oversight.

Integrating such a credit matrix within the AQF would have the further advantage of being able to integrate sub-qualification elements into the AQF by specifying their weight and level. This is discussed in more detail elsewhere in this submission.

2.3. *INTRODUCING A CLEAR SET OF DEFINITIONS OR TYPOLOGIES OF MICRO-CREDENTIALS*

It would be useful to establish a typology of sub-qualification elements, and define them clearly, in such a way as to clarify their distinct purposes. This work, or an aspect of it, has commenced in the *Incorporating shorter form credentials into the AQF* Discussion Paper. These definitions could be further supported by a matrix which allows for a clear differentiation in terms of their qualities and purposes, or their placement along a series of conceptual continua.

Within this context, it may be of further value to explore whether there is a case for defining and differentiating, using a similar process to micro-credentials, other AQF qualifications. An example of this can be found in the Irish NQF, where the concept of 'volume' is included in 'Major' awards. This could be expressed as a function of (a range of) credit value. A similar descriptor could potentially also be used to express typical entry requirements. Such an exercise would likely find that there is a limited case for differentiating, for example, 'Advanced Diploma' and 'Associate Degree', as their primary distinction is the sector in which they are delivered.

Ultimately, a principles-based approach to determine which elements should be included could be agreed and implemented in the updated AQF.

2.4. *A COMPANION GUIDE THAT DEFINES AND ARTICULATES 'SOCIAL AND ENTERPRISE SKILLS'*

As mentioned above, there is an increasing precedence from a range of VET stakeholders and users of the system for integrating social and enterprise skills. However, it is recommended that this be done meaningfully and include a clear rationale for doing so.

An example of a rationale is found in Ontario, Canada, where these skills are referenced in regulation as: 'the basic fundamental, personal management, and teamwork skills [for graduates] to get, keep, and progress in a job-of-choice. There is an appropriate depth of achievement consistent with the essential employability skills learning outcomes, identified for this level of credential'[9].

Based on international leading practices in this area, for these skills to be acquired deeply, and to be applied effectively, they must be contextualised to the field of education, and the learner must be able to relate them to relevant contexts. As such, mandating them as distinct units would not be effective. This approach can be linked to the German concept of competency, which is described as 'the ability and willingness of an individual to use knowledge and skills as well as personal, social and methodological competences to act in a reasoned as well as individually and socially responsible

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[9] Ontario Reg. 34/03 under the *Ontario Colleges of Applied Arts and Technology Act, 2002*, Minister's Binding Policy Directive for Programs of Instruction.

manner. In this context, competence is also understood as a broad vocational action competence. The DQR [German Qualifications Framework] presents the competence dimensions: knowledge, skills and personal (social and independence) competences.'[10]

It is therefore recommended that they be defined and articulated in a companion guide, which also includes possible strategies for their implementation, and referenced in the AQF qualification descriptors. Further guidance to VET providers could potentially be included in training packages. This process could be initiated by Ministerial Councils, and undertaken by Senior Officials.

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[10] Hensen, K A & U Hippach-Schneider. 2016. Key competences in vocational education and training—Germany. Cedefeop ReferNet thematic perspectives series. (p.5)

3. IN RELATION TO THE APPROACHES SUGGESTED BY THE PANEL OR PROPOSED IN THE SUBMISSION OR THROUGH CONSULTATIONS, WHAT ARE THE MAJOR IMPLEMENTATION ISSUES THE REVIEW SHOULD CONSIDER?

3.1. PURPOSE OF QUALIFICATIONS

Integrating language that better articulates the purpose of qualifications and their levels is a priority.

This could be enhanced by a different visual representation of the AQF, which would also allow for the integration of sub-qualification elements, should these be agreed.

3.2. MORE CONSISTENT MAPPING AND INTEGRATING CREDIT WEIGHTS

Significant consideration should be given to the concept of a 'credit points' system in the AQF (as outlined in the discussion paper), but noting that it would likely apply more to the VET sector.

Such an approach may also require assurances with respect to funding to alleviate concerns arising from the change.

This approach would also likely address some of the concerns expressed by the VET regulator, with respect to 'unreasonably short courses', by providing a stronger indication of institutional inputs.

Depending on feedback, a credit point system could be either piloted in certain qualification areas (for example deemed high-risk by the regulator or high priority by senior officials) or phased in with new and updated training packages.

This approach could lead to a more consistent and transparent process for mapping/assessing VET qualifications to the AQF.

3.3. INTEGRATING SUB-QUALIFICATION ELEMENTS

Inclusion of sub-qualification elements in the AQF appears to be warranted nationally. The challenge, however, will likely be reaching agreement about which elements to include and how.

A national consultation strategy led through the Ministerial Councils would be welcomed. This process should also seek to establish which body or bodies would be the arbiter of these elements.

3.4. INTEGRATING 'SOCIAL AND ENTERPRISE SKILLS' MEANINGFULLY

The suggestion in the Discussion Paper that 'social and enterprise skills' can or should be taught and assessed independently, rather than within their disciplinary context is inconsistent with the evidence, both in terms of how VET systems are structured, and within the pedagogical/andragogical research[11].

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[11] This is referenced in Wheelahan et al. (2015), Hensen & Hippach-Schneider (2016), both cited here. More detailed discussion can be found in Jonnaert, P, J Barrette, S Boufrahi & D Masciotra. 2005. Contribution critique au développement des programmes d'études : compétences, constructivisme et interdisciplinarité. Note de synthèse. In *Revue des Sciences de l'éducation* (pp. 667-696), Volume XXX(3), as well as in CEDEFOP. 2010. Learning outcomes approaches in VET curricula: A comparative analysis of nine European countries. Luxembourg: Publications Office of the European Union.
It is also worth noting that, while the source for the assertion was the NSW Department of Industry, the NSW Department of Education commissioned a paper that found the opposite was necessary to counter potential job losses resulting from AI and digitalisation (Buchanan, J, R Ryan, M Anderson, R A Calvo, N Glozier & S Peter. 2018. Preparing for the best and worst of times. Future Frontiers Analytical Report. Sydney: NSW Department of Education).

It is likely that the delivery of these skills and their meaningful integration into the learning process will incur cost. While this fact is outside the scope of the AQF review, it should be noted as an implication of including and referencing these.