Review of the Australian Qualifications Framework

Victorian Government Submission

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EXECUTIVE SUMMARY

The Victorian Government has committed to an ambitious program of reform to make Victoria the Education State. This includes our *Skills First* reforms, which have provided more Victorians with the skills they need to be successful. *Skills First* has improved the quality of training, using State Government contracting practices to remove providers who do not meet quality expectations.

The Victorian Government is committed to a world-class post-secondary education and training in Victoria. To support this commitment, there needs to be a qualification system that builds public confidence in the graduates of vocational and university qualifications.

The Victorian Government's view is that the AQF is broadly fit for its purpose, including its purpose to enable other parts of the Australian education and training system to meet their purposes. As a result, it is essential that reforms do not unintentionally undermine its current operation or disturb its stability. In particular, it is essential that the AQF continues to support:

a) Qualification design and regulation, to maintain and improve important contributions to the quality of Australian education and training
b) Victoria's burgeoning international education sector, which has been our largest services export industry for a decade (generating $10.6 billion in export revenue in 2017-18) and is built upon the international recognition of Australian qualifications.

The Victorian Government recommends that the Commonwealth enhance the AQF through incremental changes, to support the state-based reform of the TAFE and training system and to update the reference point for the national qualifications system with regard to knowledge, skills and their application.

These medium- to long-term enhancements should contribute to improving the public perception of vocational and university qualifications by progressively:

a) Acknowledging 'the application of knowledge and skills' in the AQF levels alongside the breadth and complexity of 'knowledge and skills'

b) Developing the specification of 'knowledge and skills' at each AQF level to include:

   o   Literacy and numeracy skills

   o   Enterprise and social skills

c) Further developing systems to provide credit for students' previous learning outcomes.

The Victorian Government also recommends short-term enhancements to the AQF to:

a) Facilitate the recognition of 'short form credentials' such as skill sets in Vocational Education and Training (VET) and micro-credentials in universities
b) Establish independent governance arrangements to ensure that the AQF is thoroughly implemented.

The Victorian Government welcomes the opportunity to consult further as the expert review panel develops and delivers its recommendations.

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1) INTRODUCTION

a) Purposes of the AQF in the qualifications system

The Discussion Paper asks submissions to consider the ways in which the Australian Qualifications Framework (AQF, 'the framework') is fit, or not fit, for purpose. The national system of qualifications:

- Helps <u>the community</u>, including Australian employers and the international community, to understand learning outcomes in Australian post-secondary education by:
  - o Positioning qualifications relative to one another in simple ways that reflect their relative depth and complexity (e.g. a Bachelor Degree relative to an Associate Degree)
  - o Aligning (where possible) to comparable international qualifications frameworks to support recognition of Australian qualifications in other countries

- Ensures that <u>students'</u> learning outcomes, including those of international students, are recognised and understood, so students have mobility across providers, qualifications and nations as they build a portfolio of learning

- Requires the <u>designers of qualifications</u> to position their qualifications consistently relative to other qualifications

- Enables <u>regulators</u> to maintain the integrity of qualifications by ensuring that issued qualifications are evidence of learning outcomes at the agreed level or position.

The AQF has a fundamental role in the qualifications system, in conjunction with the legislation and professional practice that shapes the behaviour of the accrediting and regulating bodies.

Examining the AQF in isolation from the qualifications design, accreditation and quality assurance arrangements based upon it is deceptive because these elements operate together like links in a chain. This submission refers to <u>both</u> the characteristics of the AQF that make it applicable in the qualifications system <u>and</u> the need for other parts of the qualifications system to apply the AQF effectively. Evidence from the oldest qualifications frameworks suggests that it is <u>the link with</u> quality assurance processes (regulatory arrangements) that make qualifications frameworks effective.[1] The AQF needs to contain sufficient specification of these links.

b) The strengths of the AQF

> The Victorian Government's view is that the AQF is broadly fit for its purpose, including enabling other parts of the qualifications system to meet their purposes. As a result, it is essential that incremental reforms do not unintentionally undermine or disrupt its current operation or disturb its stability.

The AQF has provided a stable structure against which the complexity and breadth of learning outcomes from Australian qualifications can be described. Its links to international frameworks, especially the European Union's European Qualifications Framework (EQF), have facilitated the international recognition of Australian qualifications. The AQF influences the attraction of international students to Australia, delivery of Australian qualifications offshore, and overseas employment of graduates of an Australian qualification. Any changes to the AQF may have a significant impact on the international education sector, Victoria's largest services export industry.

The AQF's hierarchy of levels has supported policy developments in both university and vocational education by defining levels of educational achievement and hence progress between the levels. For example, in Victoria, the eligibility for government subsidies in VET is defined by (among other things) a

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[1] Coles, M., Keevy, J., Bateman, A. and Keating, J. (2015). Flying blind: Policy rationales for national qualifications frameworks and how they tend to evolve', *International Journal of Continuing Education and Lifelong Learning*, Vol. 7, Issue 1 (November 2014), Hong Kong.

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student's movement up the AQF's qualification levels. Nationally, the allocation of Commonwealth Supported Places for universities is defined relative to fields of study and qualifications by their AQF level.

However, there are some specific aspects of the AQF and its application that could be enhanced in response to current and emerging challenges.

2) THE AQF LEVEL DESCRIPTORS

The Victorian Government supports the continuation of the AQF's current approach that Senior Secondary Certificates of Education (SSCE) are a type of qualification that is best not allocated to a level of the AQF.

a) The systemic effect of a single hierarchy

The AQF currently operates in a one-dimensional hierarchy of 10 levels, which aligns with the structure of some major international qualifications frameworks, such as the EQF and the qualifications frameworks in Hong Kong and New Zealand. There is a great benefit to maintaining international alignment.

However, the AQF currently does not 'accommodate the diversity of purposes of Australian education and training' in that its structure implies that VET qualifications (principally at levels 1 to 4) are less valuable than university qualifications (principally at levels 8, 9 and 10). This contributes to a public perception that VET qualifications have lower status than university qualifications, and are intended for the students who are unable to attend university.

The Victorian Government recommends that the Commonwealth Government support state-based reforms by taking every opportunity to improve the public perception of VET qualifications. Long-term reform of the AQF is, among other things, an opportunity to redefine and enhance the status of learning outcomes from vocational education and training. It is also an opportunity to encourage the regulators to redefine the education and training sectors in terms of the qualifications that can be taught in each sector.

b) Efficacy of knowledge, skills, and the application of knowledge and skills

The Victorian Government supports short-term reform to remove the duplication of level descriptors and qualification type descriptors, and link qualification types directly to levels. It would then be possible to revise the level descriptors to ensure clearer separation, and in the longer term to require qualification designers to meet community expectations of graduates by incorporating clear and logical references to foundational literacy and numeracy and to 'enterprise and social skills' such as collaboration.

The Victorian Government also supports a longer-term reform to restructure the levels of the AQF using just two dimensions:

- Knowledge and skills, which are criterion-referenced

- The application of knowledge and skills, which is contextual.

This reform would require further explicit definition of 'knowledge' and 'skills', avoiding for instance the presumption that 'skills' represent the application of 'knowledge', and would require further articulation of how 'the application of knowledge and skills' would be identified and measured relative to its context.

A two-dimensional specification defines a plane which would position institution-based pathways differently from apprenticeship and work-based pathways. For example, the institutional pathway to a Certificate III in Bakery can be completed in one year of training while the apprenticeship pathway to the same certificate typically takes three years of training and employment. While the two pathways might represent the same 'knowledge and skills', the apprenticeship pathway represents considerably more 'application of knowledge and skills'.

Other educational policies that currently refer to progress against a one-dimensional AQF hierarchy, e.g. 'upskilling' requirements in VET, might then refer to progress in either dimension or both.

Implementation challenges centre on the manner in which the AQF would specify aspects of knowledge and skills in criterion-referenced definitions, while contextual skills such as teamwork and collaboration are

included as aspects of 'the application of knowledge and skills'. The specification of qualifications would then need to be updated against the two-dimensional framework.

3) THE AQF QUALIFICATION TYPE DESCRIPTORS

The Victorian Government supports the panel's proposal to use the AQF levels only to describe knowledge and skills and their application, and to provide a description of each qualification type that is linked to the levels. Then the description of each qualification type need not refer (again) to knowledge and skills and their application, but it should refer to contextual matters such as:

- Foundational literacy and numeracy
- Enterprise and social skills
- Volume of learning.

a) Foundational literacy and numeracy

Many employers comment that graduates, especially at AQF levels 3 to 8, lack the foundational skills in literacy and numeracy that would make them employable. The Victorian Government recommends that the Commonwealth Government, in the longer term, should enhance the AQF and associated regulatory arrangements to contribute to securing appropriate literacy and numeracy outcomes for graduates.

The Victorian Curriculum and Assessment Authority (VCAA) plans that, from 2021, students completing the Victorian Certificate of Education (VCE) and the Victorian Certificate of Applied Learning (VCAL) will receive information about whether they have achieved or exceeded the literacy and numeracy standards typically expected of those entering the workforce from school. Comparable requirements exist in relation to the senior secondary certificates in New South Wales and Western Australia. While senior secondary certificates are not located at a level of the AQF, they are associated with standards of literacy and numeracy.

Similarly, some professional pathways now also require a standard of literacy and numeracy. Since July 2016, all students enrolled in an accredited Initial Teacher Education (ITE) program have been required to meet the standards in the Literacy and Numeracy Test for Initial Teacher Education (LANTITE), effectively making its standards a requirement for provisional registration as a teacher with the Victorian Institute of Teaching (VIT). AQF levels 7, 8 and 9 describe levels of cognitive and communications skills but do not describe literacy and numeracy skills or attribute measures.

In this context, it will be important for the review of the AQF to coordinate its work with the concurrent review of senior secondary pathways and the implementation review of the LANTITE.

b) Enterprise and social skills

Many employers also comment that graduates, especially at AQF levels 3 to 8, lack foundational skills such as the capacity to work in teams, to identify and solve problems, or to devise creative solutions. However, this group of 'enterprise and social skills' remains poorly defined and tested. These skills are insufficiently specified (if at all) in the most qualifications. The Victorian Government recommends longer term enhancements to the AQF and associated regulatory practices to require qualification designers to specify a level of these skills in qualifications at AQF levels or with specific employment contexts.

Longer-term reforms could include requirements for these skills alongside 'the application of knowledge and skills' so qualification designers can draw upon them when their context requires it. The specification of these skills could be included if/when there is sufficient evidence to:

- Select and define the appropriate skills
- Verify that these skills can be taught and learned
- Develop valid, fair and reliable assessments of these skills in the required context.

c) Volume of learning

The second objective of the AQF is to 'support contemporary, relevant and nationally consistent qualification outcomes which build confidence in qualifications'. For VET qualifications, both the Victorian Department of Education and Training (DET) and the Australian Skills Quality Authority (ASQA) have consistently identified an unusually short total learning time for a delivered qualification as a risk indicator for poor quality delivery, leading to poor qualification outcomes.

ASQA's *Review of Issues Relating to Unduly Short Training* demonstrates that 'Australia's approach differs significantly from other major VET systems, most of which allocate unique notional learning times to each individual qualification. Some assign both credit points and actual hours to individual qualifications. Some are adopting consistent and more specific approaches to setting supervised and unsupervised hours for each qualification.' [2] From an international education perspective, volume of learning disparities across national qualifications frameworks can be a barrier to qualifications recognition.

The qualifications framework, the Standards for Training Packages and the endorsed content of Training Packages can play linked and reinforcing roles in addressing these issues.

> The Victorian Government supports the use of a broad time frame to specify the 'volume of learning' in qualifications at each level, preferably expressed in years rather than hours to allow the States sufficient scope to specify the 'amount of training', i.e. hours of training delivery, that they will fund and to allow for variation in the 'unstructured learning' required. Very minor changes could achieve this result.

Implementation will require a clear distinction between the 'volume of learning' and its two components:

- The 'amount of training' which refers to structured learning time that is led by an educator (typically a trainer or tutor) and will vary depending upon the provider's delivery mode (classroom, online and/or work-based) and their student cohort

- Other 'unstructured learning', which might include private study, practice activities, reading, research, etc., and will also vary with the 'amount of training' and the student cohort.

This is because the States generally fund Registered Training Organisations (RTOs) on the basis of the 'amount of training', i.e. trainer-led, structured learning time, that they deliver.

4) CREDIT FOR PARTS OF QUALIFICATIONS

There has been no explicit link between the AQF and frameworks that specify the recognition of components of qualifications (such as subjects and units of competency), even though this link is characteristic of some of the leading international frameworks, especially the EQF and the European Credit Transfer System (ECTS).

Qualifications frameworks and credit systems have convergent objectives in developing learning pathways so individuals can build on what they have achieved, independent of the education and training system or learning context in which the learning took place. The mechanisms through which they aim to do this differ.

- Qualifications frameworks classify qualifications using level descriptors that are based on learning outcomes

- Credit systems enable learning outcomes achieved in different institutions, learning contexts, systems or over a longer period of time, to be used towards achievement of a qualification. [3]

While a credit system might not formally be a part of the qualifications framework, there is potential for a considerable public benefit from an explicit link between the two.

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[2] Australian Skills Quality Authority (2017) *A review of issues relating to unduly short training*, p.10. Accessed at https://www.asqa.gov.au/sites/g/files/net3521/f/strategic_review_report_2017_course_duration.pdf

[3] CEDEFOP (2010) Linking Credit Systems and Credit Frameworks http://www.cedefop.europa.eu/files/5505_en.pdf

The Victorian Government broadly supports the Review Panel's longer-term reform proposal to develop improved systems of credit recognition for the component parts of qualifications, and supports further investigation of possible solutions to this problem, potentially including:

- A more standardised system of institution-based Recognition of Prior Learning (RPL)

- A national register of RPL that providers could use to access common practice

- An hours-based credit point system related to subjects/units.

These systems may be voluntarily referenced by providers. The longer-term implementation, potentially of a combination of these elements, would need to be subject to:

- Piloting, potentially in particular areas of education and training

- Consideration of asessment reform, to build provider confidence in the assessment practices of other providers

- Rationalisation of units in the national training system

- Cost-benefit analysis.

It would be beneficial for the credit transfer register for subjects and units to integrate wherever possible with the language of the AQF, to inform institution-based RPL, and to acknowledge the challenges encountered in previous Victorian credit recognition systems.

Standardised credit arrangements could be initiated as the need arises, e.g. to specify the credit (advanced standing) for students transitioning into AQF level 7 Bachelor Degree qualifications for Initial Teacher Education from AQF level 5 Diplomas.

It would also be beneficial to update the AQF Qualifications Register Policy to facilitate credit, and for providers to keep a credit register of precedent decisions to provide credit.

We acknowledge significant implementation challenges for this development:

- It involves a substantial body of work across the education sectors which would create a broad range of practical issues 'on the ground' for the (as yet unspecified) agency tasked with this development

- There is a risk that credit points could become a 'currency' that students expect to accumulate and 'trade', whereas students wanting to use credits towards a new qualification would still need to apply for credit at their enrolling institution which would assess their application

- A system of credit points could potentially conflict with the current systems to provide RPL, creating confusion for students and unnecessary work for RTOs.

A better developed system for credit recognition would require a thorough elaboration of the current Qualifications Pathways Policy for the AQF, noting that:

- The primary responsibility for providing pathways sits with providers, training package developers and regulators

- Many implementation issues arise from providers' lack of transparency and consistency in relation to the assessment of entry information and the articulation processes for pathway qualifications.

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5) SHORT FORM CREDENTIALS

Given that a purpose of the AQF is to help the community understand learning outcomes in post-secondary education, the Victorian Government supports enhancements of the AQF to classify the outcomes of recognised and emerging certificates such as:

- Vendor and commercial certificates, e.g. Microsoft programming certificates

- Various short form qualifications, e.g. skill sets in VET, micro-credentials in university.

Potential reforms would distinguish qualifications from 'short form credentials'. Short form credentials could then be aligned across several AQF levels using the level descriptors, provided that they can be quality assured. The process to achieve this alignment would depend upon the designers and managers of short form credentials voluntarily applying to the qualification accreditation bodies for this recognition and alignment. At this point, short form credentials could also be described with pathways to related qualifications, and associated with the AQF level of the nearest qualification.

For the Victorian Government, the professional development courses for school teachers that are delivered through the Bastow Institute of Education Leadership illustrate the potential benefits of aligning 'short form credentials' to AQF levels. Similarly, the use of Skill Sets in vocational education and training could be facilitated by potential students understanding the broad level of their program.

A potential short-term reform could include the use of the AQF logo and text on records of results and statements of attainment if the units, modules, subjects, etc. have been quality assured.

Implementation issues will arise when the component parts (units) of a credential are at a range of levels. In these instances, the credential might need to link to the AQF level for its highest level units (those with the greatest depth and complexity) even though the units are not formally allocated to an AQF level.

6) GOVERNANCE AND REGULATION

Many issues related to inconsistent qualification outcomes arise partly from the content of the AQF and partly from its application in the design, accreditation, regulation and implementation of qualifications in each sector. The Victorian Government recommends enhancements of the AQF to make it sufficient to influence the rest of the qualification system to effectively ensure consistent outcomes from qualifications.

The Victorian Government supports the explicit allocation of responsibility to monitor and regulate the application of the AQF to an independent organisation, potentially updating the function of the former AQF Council. However, the detail of the appropriate governance arrangements could not practically be formulated until other issues related to the design of the AQF and its application across the education and training system are resolved.

The implementation challenge would be to allocate this responsibility to an entity that is sufficiently independent of the influence of major stakeholders, including the bodies responsible for quality assurance activities. An entity with the responsibility to monitor and regulate the application of the AQF would have a unique opportunity to work with the regulators to introduce greater flexibility into the regulatory links between the AQF levels and the education sectors, potentially facilitating:

- University delivery of qualifications at the lower AQF levels that are generally associated with VET

- The delivery in the VET sector of qualifications at higher AQF levels, e.g. Bachelor and Masters level apprenticeships.

A progressive retreat from an inflexible allocation of qualifications at particular AQF levels to universities and to RTOs in the VET sector should improve the public perception of the value of VET qualifications and the practical orientation of university qualifications towards employment opportunity. However, implementation would need to be progressive. Such cultural shifts take time and radical changes could risk destabilising the AQF and international perceptions of our education system.

7) CONCLUSION

The Victorian Government recommends that the Commonwealth update and strengthen both the AQF's central classification of qualifications and its policies that link the central classification into the broader system of qualifications. To maintain the integrity of Australian qualifications, the AQF needs both an internal structure that reflects the depth and complexity of qualifications and strong links with quality assurance processes related to qualification design, development, accreditation and delivery. The AQF needs to contain sufficient specification to make these links effective.

The Victorian Government also recommends that the Commonwealth enhance the AQF to contribute to an improved public perception of vocational qualifications.

We welcome the opportunity to consult further regarding specific suggestions and proposals as they are developed.