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SUBMISSION TO THE UNIVERSITIES ACCORD PANEL (11 April 2023)

Thank you for this opportunity to make a submission to the Australian Universities Accord Panel. This submission focuses on the opportunities provided by the **Australian Qualifications Framework Review** and support more broadly for **lifelong learning**.

Recommendation: Full implementation of [Australian Qualifications Framework \(AQF\) Review](#)

It is recommended that the recommendations of the Australian Qualifications Framework (AQF) Review be implemented in full as a critical policy enabler to underpin the effective operationalisation of the Accord Panel's findings and recommendations in relation to

- meeting Australian (knowledge and) skills needs,
- lifelong learning, and
- a strengthened tertiary system.

Complementary Recommendation: Develop a National Lifelong Learning Strategy

It is also recommended that the development of a National Lifelong Learning Strategy be endorsed to support Accord aspirations for skills development, lifelong learning and a strengthened tertiary system.

This submission proposes that the recommendations of the 2019 [Australian Qualifications Framework \(AQF\) Review](#) be implemented *in full* as a **critical policy enabler** to activating a strengthened, connected tertiary education and training system. Such a strengthened tertiary education system should accord equal status to vocational education & training (VET) and higher education (HE) qualifications and **place the learner-earner at the centre of qualification design for jobs and skills attainment and social participation**. In particular, only by implementing the integrated package of AQF Review reforms in full will it be possible to **ensure that skills, and developing skills complexity, are accorded equal status to knowledge in qualification design**. As set out in the AQF Review Expert Panel's report, the current AQF is deeply flawed, out-of-date and riddled with inconsistencies and gaps (for example, digital literacy is **not** mentioned in the current AQF). Well-functioning qualification frameworks "establish a basis for improving the quality, accessibility, linkages and public or labour market recognition of qualifications within a country and internationally" as a "bridge to lifelong learning" (OECD, 2007, p 22). Australia needs a well-functioning AQF that will deliver better qualifications that can be designed to support lifelong learning and modern workforce knowledge and skills needs.

I was a member of the [AQF Review Expert Panel](#), chaired by the late Emeritus Professor Peter Noonan AM. In March 2023, at a [Public Symposium](#) in honour of Professor Noonan's extensive contributions to Australian education, fellow Expert Panel member, Ms Megan Lilly ([Ai Group Centre for Education and Training](#)) and I [presented](#) on the opportunities presented by the Noonan vision for the revised AQF and sought to dispel myths that may be hindering its implementation.

This submission addresses a number of the Accord's Terms of Reference and questions set out in its Discussion Paper (DP). Particular alignment to the **relevant DP questions will be addressed in the second half of the submission** in tabular form. First, an **overview of the AQF Review** and some of its relevant recommendations are provided to set the context. **The supporting recommendation for the development of a National Lifelong Learning Strategy** is then briefly addressed.

It is noted that another submission made jointly by Professor Liz Johnson, Associate Professor Jason Lodge and me has suggested that a **National Centre for Student Success** could provide the necessary pedagogical support and system-wide collaborative effort needed to scale the curriculum, learning, teaching and assessment transformation required to activate these learner-centred reforms; reforms which, in the words of Noonan's AQF Panel, will "further central economic and social policy goals to widen participation in education and training and improve educational attainment levels, particularly among those with low levels of participation and attainment" (AQF Review Report p 8).

PART 1: The Australian Qualifications Framework (AQF) Review

The [Noonan Review \(2019\) of the Australian Qualifications Framework \(AQF\)](#) is a critical piece of policy architecture that should be implemented *in full* to underpin the effective operationalisation of the Accord Panel’s findings and recommendations in relation to: meeting Australian present and future knowledge and skills needs; making lifelong learning a practical reality; and delivering a strengthened tertiary system, supported by concomitant governance and regulatory enhancements.

Implementing a modern, revised AQF to support Accord findings and recommendations versus

Maintaining the status quo – the current AQF – that will not do so.

As recorded in the AQF Review Report, the current AQF is very widely used across the Australian tertiary sectors and is generally accepted as a useful instrument with both national and international benefits. Megan Lilly has [observed](#) recently that, although in the 1990s and early 2000s, Australia was a global leader in the development of qualifications frameworks, that is no longer the case. Other countries, particularly in Europe, have moved to embrace qualifications frameworks “as a tool to facilitate an agile workforce suited to rapid technological, industrial and social change” (AQF Review Report p 144).¹ As [Minister O’Connor stated](#) in September 2022, in the context of simplifying VET qualifications:

Australia’s qualifications system has been largely unchanged since the 1990s and is no longer fit for purpose.

Australia requires a flexible and adaptive training system that includes industry-specific skills and maximises transferable skills across sectors, one that recognises an individual’s prior learning and experience.

Our Government wants to support a VET system that not only gets people into jobs, but also supports their lifelong learning, enabling workers to upskill and reskill throughout their career.

We should have the same aspirations for our HE sector.

In work commissioned for the AQF Review carried out by PhillipsKPA ([2018](#)) and cited in the Review Report (p 74), it is observed that:

As a document, the AQF currently fails in one of its key objectives, which is to clarify for the general public the options from which they may choose to achieve their learning and employment goals. This conclusion is inescapable given the considerable expressions of confusion among those whose job it is to design, deliver and quality assure educational programs.

The [Final Report](#) of the Australian Qualifications Framework (AQF) Review was released in October 2019. In December 2019, the (then) Government accepted all the higher education (HE) recommendations, and the aims for vocational education and training (VET), subject to further state and territory discussions. After a COVID-19 hiatus, the opportunities offered by this critical enabler of eco-systemic reform have received recent and renewed impetus. Minister O’Connor, speaking at the [Public Symposium](#) to honour the late Professor Peter Noonan in March 2023, said that the AQF reforms proposed would be “front of mind” in discussions with states and territories (at 20:00mins). Minister O’Connor quoted with specific approval the Review Report’s conceptualisation (p 8) of a revised AQF that needed to operate in, and help shape a future in which:

Post-secondary education and training is conceived and redesigned as a diverse set of offerings, available through better linkages and pathways between the VET and higher education sectors.

¹ All subsequent page references are to the AQF Review Report unless otherwise indicated.

These linkages and pathways will no longer be linear and hierarchical; they will need to recognise that throughout adulthood, people need to develop new skills in different areas and at different levels. Central to this objective is reinvigorating the VET system and raising its standing.

The *World Economic Forum (WEF) in 2020* described COVID-19's acceleration of Industry 4.0's disruption to the future of learning and work as a “**double disruption scenario for workers**”. In that light, and as against the Accord's Terms of Reference and questions posed in its February 2023 Discussion Paper, the revised AQF offers a bold vision to support innovation in future qualification design for lifelong learning across a connected education eco-system, from secondary to tertiary and beyond. As exhorted by its Terms of Reference, the AQF Review proposed a “flexible and responsive instrument” to guide “consistent high quality and transparency” in Australian education and made the case for substantial change. A staggered implementation plan was proposed to finalise the reforms under a new AQF governance body, and an impact assessment was conducted (see [dandolopartners/Ithaca Group, AQF Review Impact Assessment \(2019\)](#)).

Internationally, the [WEF \(2021\)](#) urges “Upskilling for Shared Prosperity” and the **linking of national qualification systems to lifelong learning**, so that skills are recognised globally. Broadly, this is what the AQF Review sought to deliver. The reforms proposed for a **revised AQF underpin a system-wide, rather than a siloed, hierarchical sector-constrained, approach to defining qualification types for lifelong learning** that:

- values vocational and higher education equally
- emphasises Senior Secondary's role in preparing students for post-secondary pathways
- rebalances the relationship between knowledge and skills by allowing for sophisticated skills attainment in its own right (and not tied to a hierarchy based on knowledge complexity), which is an absolute imperative for skills reform to encompass emerging skills needs, and
- promotes multi-directional learner pathways within and between sectors, with better credit, prior learning and experience recognition (including for micro-credentials) for lifelong learners.

The many inadequacies and conceptual flaws of the current AQF were well canvassed in the Review's extensive [commissioned work and submissions made](#).² In response, a less complex AQF was proposed, with a **primary focus on AQF qualification types** (eg, Bachelors, Masters, Diplomas) **and learners**, rather than on the qualification *level*, which has little meaning for employers or learners. A **single, clearer taxonomy** was recommended, presented with only one set of generic *descriptors* to replace the current and confusing two sets of purported *learning outcomes*. The shift to qualification types that specify descriptors for qualification design reflects the advice the panel [received](#) that graduate learning outcomes are, of course, more appropriately reflected in individual qualification design. The 10 current hierarchical and poorly differentiated “levels” are recommended to be reduced to eight “bands” of Knowledge and six “bands” of Skills, all clearly and logically differentiated and more flexibly applied.

Contemporary definitions of the three domains – Knowledge, Skills and Application – were proposed, all defined in terms of action: the *information* to inform action (Knowledge), the *capabilities* to take action (Skills) and the *context* for action via learning and assessment conditions (Application). The “focus areas” for each domain were made explicit (they are missing in the current AQF): for example, under Skills, focus areas of learner self-management; problem solving and decision-making; communication; collaboration; and psychomotor skills. **The three domains, together with ‘General Capabilities’** (language, literacy and numeracy skills; core skills for work;

² Consultation in all capital cities and two regional centres; 134 submissions received; independent research commissioned; extensive testing of reform options.

digital literacy; and ethical decision-making) can be flexibly interwoven in the tailored design of individual qualifications for the accurate articulation of the specific learning outcomes for individual qualifications under a qualification type (for example, for the individual qualification of the ‘Bachelor of Business’, developed under the Bachelor Degree qualification type). Figure 1 (following) depicts the way in which the three domains (Knowledge, Skills and Application) interact flexibly with General Capabilities to foster learning and its assessment in an integrated, composite qualification whole. In practice they are inextricably intertwined, with Application (for the context of and assurance of that learning) playing a key role throughout.³

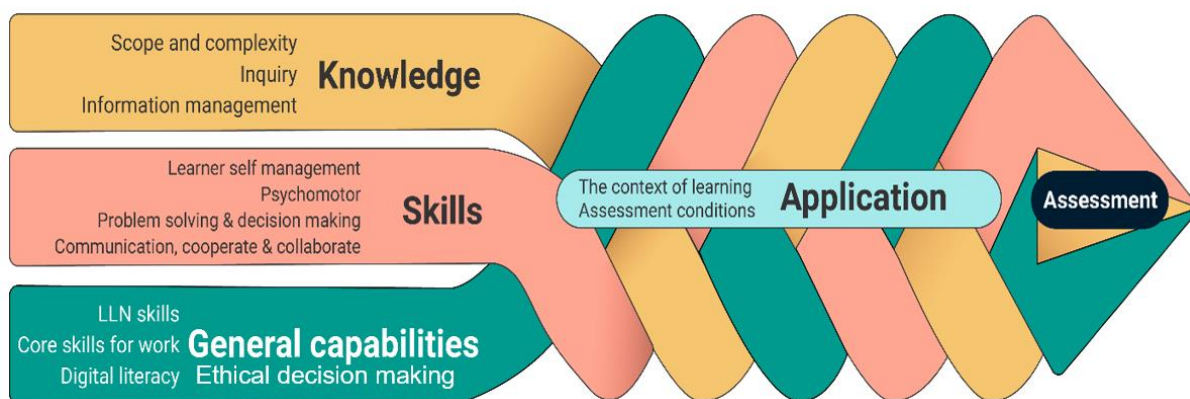


Figure 1: AQF domains and focus areas

Figure supplied by ACER (2019), with the AQF Panel’s addition of ethical decision making (AQF Review Report, p 30)

For users of the revised AQF there will be a level of coherent detail that is not currently available. **More accurate qualification design is enabled particularly by not requiring that all levels/ bands be ‘locked’ into progressing together; reflecting the reality that Knowledge, Skills and their Application do not all develop at the same time and at the same rate in lockstep with increasing Knowledge complexity.** Unlocking Skills levels/ bands allows for the accurate articulation of complex skill acquisition as the modern workforce requires. General Capabilities are incorporated in an individual qualification as appropriate to, and complexity dependent on, the relevant field or discipline. Unlocking Application completely from Knowledge and Skills (when Application is always specific to the context of the individual qualification) also **allows individual qualifications to better represent to employers and learners the practical context within which the learning and assessment occurs** (for example, whether by way of work integrated learning (WIL) or other forms of practice-based learning and assessment, such as **higher degree apprenticeships or cadetships**). Rules for aligning level/band descriptors to qualification types remain to be settled, with two options presented. Qualification types will require realignment against the revised taxonomy, with three options presented. Revised descriptions for each qualification type will then need to be provided (for example, ‘Qualifications of this type will... [incorporate features specified by the qualification design rules]’ (and see, for example, Review Report Appendix 6).

Using these various features, the revised AQF is a tool for qualification design that allows generic descriptors for qualification types *to be developed specifically* into learning outcomes that are relevant and appropriate for individual qualifications.

³ Expert advice commissioned from ACER (2019) assisted the AQF Review in its conceptual and technical analyses for a revised taxonomy with clearly differentiated and defensible levels/bands and for the revision of each domain’s focus areas and descriptors.

The detailed AQF Review Report sets out these various reforms proposed in greater detail, together with many other features of a revised AQF. For example, it is noted that the Accord Discussion Paper (p 18) references the

*...increasing **overlap in relation to diplomas and advanced diplomas**. This reinforces the need for a **non-hierarchical and flexibly applied qualifications framework** that encourages recognition of credit and prior learning, as identified by the Review of the Australian Qualifications Framework (AQF).*

In this particular regard, the **revised AQF proposed the addition of a ‘Higher Diploma’** at the Bachelor Degree level and the removal of the Advanced Diploma, **to create a sequence of shorter qualifications from Diploma to Graduate Diploma, for up- and re-skilling in both HE and VET.**⁴ The Review made other recommendations of value to HE specifically, including, for example: **flagging research-oriented** qualifications; better guidance for credit recognition (including for AQF alignment of micro-credentials) to enable **multi-directional pathways** that smooth learners’ aggregation of formal, informal and non-formal learning; developing an AQF qualification type (not necessarily aligned at a band) for domestic **post-secondary enabling programs**; and **volume of learning expressed in hours** (not in *years* as is currently the case) for new learners.

PART 2: This Submission’s Alignment with Universities Accord Discussion Paper

Having provided an overview of the integrated policy reform architecture that a revised AQF offers, this second part of the submission addresses a number of the Accord’s Terms of Reference and Discussion Paper questions.

The supporting recommendation for the development of a National Lifelong Learning Strategy will then briefly addressed.

DP Q	Alignment: How a revised AQF supports Universities Accord outcomes
10	<p><i>Meeting skills needs through higher education: High quality general capabilities</i> (AQF Review Recommendations 3 and 4)</p> <p>The revised AQF allows for a dedicated focus on developing high quality general, transferable “learning capabilities” (Q 10) across all age groups and all industries. The Review Panel recommended the adoption of four 21st century General Capabilities/ sets of capabilities for explicit development in the context of individual qualifications and to support lifelong learning. Those General Capabilities, referred to above, are:</p> <ul style="list-style-type: none"> • Language, literacy and numeracy skills (LLN) • Core skills for work • Digital literacy • Ethical decision making. <p>It is noted particularly that ‘digital literacy’ is a new addition, as is ‘ethical decision making’, while the core skills for work support the embedding of critical career development learning outcomes to manage iterative and agentic career decision making. Taken together, these General</p>

⁴ This AQF Review Recommendation (Recommendation 6) is to be compared, for example, with the Undergraduate Certificate that was introduced in April 2020, which is only available in HE and was *not* recommended by the Review Panel. The ***Undergraduate Certificate serves to entrench further disparity in status between HE and VET.***

	<p>Capabilities are those valued by employers, particularly for their transferability between roles. They are foundational for further (lifelong) learning and for workforce and social participation and success.</p> <p>The revised AQF also recommends the adoption of contemporary definitions of Knowledge, Skills and Application, defined in terms of action (referred to above): the information to inform action; the skills and capabilities to take action; and the context for action. Focus areas for the Knowledge and Skills domains are identified (they are currently absent and haphazardly developed over the current two sets of learning outcome descriptors).</p> <p>Proposed Knowledge focus areas (particularly apposite in the current context of artificial intelligence and large language models (such as ChatGPT) are:</p> <ul style="list-style-type: none"> • Scope and complexity of information that learners are expected to access and understand • Inquiry – identify, locate, evaluate and acknowledge sources of information • Information management – manipulate information in various ways. <p>Proposed Skills focus areas are:</p> <ul style="list-style-type: none"> • Learner self-management skills • Problem solving and decision making skills • Skills to communicate in the context of learning • Skills to cooperate and collaborate in the context of learning • Psychomotor skills. <p>Psychomotor skills is a new Skills addition. Its inclusion in the revised AQF “provides the opportunity to signal the value of a course that is fostering the development of sophisticated specialist skills involving the use of one’s own body and/or tools” (p 29). Such skills underpin many VET qualifications and also professional qualifications requiring high levels of dexterity, such as medicine, dentistry and creative and performing arts.</p> <p>As described above, and set out in Figure 1, the revised AQF taxonomy and qualification design rules will allow for a flexible integration of Knowledge, Skills, General Capabilities and Application (which is context specific and not rigidly linked to levels/ bands of Knowledge and Skills), to improve the quality and accuracy of qualification design and responsiveness to labour market demands.</p>
<p>15</p>	<p><i>Lifelong learning: Growing a culture of lifelong learning</i> (AQF Review Recommendations: making lifelong learning a practical reality underpins all Recs)</p> <p>The revised AQF provides the necessary policy architecture to enable and grow a culture of lifelong learning. As stated in the AQF Review Report (p 8): “Lifelong learning must become a practical reality for people; it cannot stand as an abstract goal.”</p> <p>The Review Panel provided a definition of ‘lifelong learning’ as follows (p 95):</p> <p><i>The term used to describe any learning activities that are undertaken throughout life to acquire knowledge and skills within personal, civic, social and/or employment-related contexts.</i></p> <p>The various ways in which the revised AQF grows a culture of lifelong learning include:</p>

- Ensuring that, “as the nature of work changes and the emphasis on lifelong learning increases, employers and students will [be able to] **seek contemporary, transferable skills (general capabilities) from qualifications**” (p 13).
- Providing “**better guidance on how to recognise previous learning** toward a new qualification to encourage and support lifelong learning” (p 14).
- Assuring that the **focus areas** identified for Knowledge, Skills, Application and General Capabilities “**provide the abilities necessary for lifelong learning**” (p 29).
 For example, in the **Knowledge** domain, the focus areas “**enable people to effectively and efficiently find and deal with information in a knowledge-based society**” by the specific inclusion of “Inquiry – identify, locate, evaluate and acknowledge sources of information” and “Information management – manipulate information in various ways” (p 29).
 For example, in the **Skills** domain, by including focus areas in the revised AQF taxonomy that are “**important[t] in the workplace and to engagement in lifelong learning**” (p 37).
- Revising the **Senior Secondary Certificate of Education (SSCE)** “to recognise that:
 - the knowledge and skills acquired in the SSCE can be at a broad range of AQF levels [Levels 1-7]
 - while the primary purpose of the SSCE is to prepare people for diverse pathways to further learning, work and effective participation in civic life, the **pathways to further and lifelong learning will be of increasing importance into the future**” (p 54).
- Providing **recognition that “Future workers are increasingly likely to access formal, non-formal and informal learning through a process of lifelong learning”** and that a variety of these shorter form credentials (including micro-credentials) “sit outside the AQF and provide education and training in a specific topic as standalone credentials or to provide credit toward an existing AQF qualification” (pp 58-59). The AQF Review suggested that **better recognition of all forms of learning could be achieved in “the preamble to the AQF**, [by giving] an outline of the types of shorter form credentials that complement formal qualifications in the Australian education and training system and **describe how they contribute to lifelong learning**” (p 63).
- As will be referred to also under Q 16 next, the AQF Review made particular **recommendations in relation to modernising and revising the existing AQF Qualifications Pathways Policy** with a view to activating a revised AQF that provides **better recognition of prior learning (RPL)** toward a new qualification to encourage and support lifelong learning, especially as the need to recognise non-formal and informal learning increases. The Review panel said (p 69):

*Through lifelong learning, students will have more interactions with formal, non-formal and informal learning. Accordingly, **a poorly functioning RPL system will present a more significant problem over time.** Better guidance alone cannot solve this problem, but it increases the importance of having clear and useful information on RPL.
 Guidance on RPL is important for application by education and training providers and for students who bear the cost of not having an adequate policy in place by paying for learning that they do not require. (p 69)*

The **AQF’s current detailed advice on RPL currently sits outside the Pathways Policy** in a separate explanation guide; “it should be elevated and modernised, with appropriate consideration of shorter form credentials” (p 64).

16 *Lifelong learning: identifying and fixing practical barriers to lifelong learning*
(AQF Recommendations 9-13)

As anticipated in the AQF Review’s Terms of Reference, the revised AQF set out a bold vision for a future-focussed AQF that is a “flexible and responsive instrument that guides the provision of consistent high quality and transparency in the Australian education system” (p 11). A **particular concern of the AQF Review Panel** in delivering its recommendations in this regard was the **need to overcome practical and systemic barriers to lifelong learning for all Australian learners** and earners, whatever their background, prior learning, prior experience or place of residence.

Aspects of the revised AQF’s reform proposals predicated on supporting lifelong learning are set out in response to the Accord Panel’s Q 15 above. Accepting the revised **AQF Review Panel’s recommendations** in relation to such matters will go a long way **towards enabling individuals’ aggregation of formal, informal and non-formal learning in a lifelong learning society and overcoming barriers to it.**

One specific matter is further addressed under this Q 16 is that of **smoothing and activating multi-directional pathways and better credit, prior learning and prior experience recognition that place the learner at the centre of the educational ecosystem.**

Learner centred pathways and credit recognition

Pathways, Credit, Recognition of Prior Learning (RPL) and Recognition of Prior Experience (RPE)

As noted in the Universities Accord Panel’s DP (p 19), drawing on work commissioned for the AQF Review by the Ithaca Group ([2018](#)), “formalised arrangements for credit... still grapple with the difficulties of operating in two systems [of VET and HE]”.

Based on the Ithaca Group’s [2018](#) commissioned research and extensive feedback it received, the AQF Review Panel found that “**RPL is an underused way of assessing learners’ existing knowledge skills**” (p 64) and that **current practices for credit, RPL and RPE are particular barriers to lifelong learning.**

The AQF Review therefore determined that greater flexibility in the construction and encouragement of learning pathways was necessary: “**Flexible and multi-directional pathways rather than simple hierarchical ones** (as the AQF is perceived to be) **are regarded as better suited to lifelong learning and rapid retraining to meet new technological challenges**” (p 144).

The Review Panel found specifically that (p 14):

*The AQF Qualifications **Pathways Policy provides only limited guidance** on credit recognition between some qualifications.*

*A **revised AQF should provide better guidance** on how to recognise previous learning toward a new qualification to encourage and support lifelong learning.*

***Adopting a shared credit point system** in Australia could improve student awareness of potential credit, encourage the take-up of pathways between VET and higher education, and facilitate better recognition of students’ qualifications internationally.*

***Additional measures including addressing funding and regulatory differences** between the sectors and supporting **innovation in design and delivery of cross sectoral qualifications** will be required to improve learner pathways.*

To address these findings that AQF Review recommended that (p 14):

	<ul style="list-style-type: none"> • The <i>AQF Qualifications Pathways Policy</i> be renamed (as the <i>AQF Qualifications Pathways Policy: Credit and Recognition of Prior Learning</i>) and revised to recognise and encourage broader and better credit recognition and multi-directional pathways, both within and between sectors, including for shorter form credentials (for example, micro-credentials). Examples of possible pathway opportunities and any requirements associated with them could be provided. • In addition to providing more detailed guidance on RPL the <i>Pathways Policy</i>, ensure sector regulatory standards are aligned accordingly for greater compliance and conformity. • Develop and test a prototype AQF credit point system for voluntary use by providers, in order to give students and providers a nationally consistent ‘currency’ for negotiating credit transfer.
<p>17</p>	<p><i>Strengthened tertiary system: better alignment and connection</i> (AQF Review Recommendations: better alignment and connection across tertiary education underpins all Recs)</p> <p>The AQF Review had a specific Term of Reference (3(d)) around considering the placement of VET and HE qualifications in the AQF, and was specifically requested to consider:</p> <ul style="list-style-type: none"> • <i>any areas of convergence and optimal points of differentiation of VET and HE qualifications in general and specifically at levels 5, 6 and 8;</i> • <i>the extent to which the AQF currently implies a status hierarchy from VET to HE qualifications and whether this can be mitigated through changes to the structure or language of the AQF;</i> • <i>means by which the AQF can assist with greater consistency in regulation of AQF compliance between HE and VET.</i> <p>Many of the observations made in this submission, both in the first part’s overview and this part’s Table, address how better alignment and connection across Australia’s tertiary education two sectors for a connected and strengthened system could be achieved.</p> <p>A fundamental matter to address is that the current AQF is a hierarchical ladder, determined by knowledge complexity. As the Review Panel observed (and Minister O’Connor endorsed in March 2023 at Professor Noonan’s Public Symposium (at 20mins)), what is needed is a (p 8):</p> <p><i>Post-secondary education and training [that] is conceived and redesigned as a diverse set of offerings, available through better linkages and pathways between the VET and higher education sectors. These linkages and pathways will no longer be linear and hierarchical; they will need to recognise that throughout adulthood, people need to develop new skills in different areas and at different levels. Central to this objective is reinvigorating the VET system and raising its standing.</i></p> <p>The Panel went on to observe that (p 8):</p> <p><i>As they transition into post-school education and training, young people must have a well-informed appreciation of the purpose of different qualifications and the relationship between qualifications. That appreciation must be accessible to adults seeking to deepen existing skills or gain new skills. Qualification outcomes will be relevant, understood, and trusted.</i></p>

	<p>Specific reforms proposed for a revised AQF that would strengthen a tertiary <i>system</i> (across currently siloed and disconnected VET and HE <i>sectors</i>) include:</p> <ul style="list-style-type: none"> • <i>A focus on qualification types and not on levels and by unlocking the levels/bands for Knowledge, Skills and Application.</i> A modern qualifications framework can no longer be founded on the assumption that Knowledge is more important than Skills, and that higher complex knowledge acquisition is patently better. While a revised AQF cannot of itself alter perceptions about “the relative status of VET and higher education... a focus on qualification types and a more flexible and less hierarchical approach would highlight the role and value of individual qualifications, rather than their place in a levels-based hierarchy” (p 13). A revised AQF architecture is an enabler of a coherent, connected and cohesive tertiary system. • <i>Enhanced pathways and credit recognition.</i> In pursuit of lifelong learning, individuals will increasingly interact with education and training in all forms (formal, informal and non-formal) over the course of their working lives. Pathways and progressions must be enabled to occur in multiple valuable directions. The revised AQF recommends: <ul style="list-style-type: none"> ○ <i>Revising the Pathways Policy</i> (as described above) to focus on multidirectional pathways, enhanced guidance for RPL and RPE, including for shorter form credentials such as micro-credentials. ○ <i>Trialling a common, but voluntary, credit point system</i> to contribute to parity of esteem and smoother pathways between different qualifications and sectors. The Panel said that this would “make learning outcomes more comparable between different institutions and contribute to parity of esteem between VET and higher education by expressing the equivalence in value of learning from both systems. It would future proof the AQF as, in time, it may be used to support the recognition of shorter form credentials by establishing a common means of assigning value” (p 69). ○ <i>Volume of learning in hours for a new learner</i> would also facilitate greater alignment within and between sectors and support the trial of a common credit point system.
<p>18</p>	<p><i>Strengthened tertiary system: reform of the AQF</i> (AQF Review Recommendations: All recommendations)</p> <p>This submission recommends that the reform of the AQF is an integral enabler for aligning and strengthening a connected tertiary system. It should be implemented in full as the integrated package of reforms proposed.</p> <p>The Final Report of the AQF Review Panel recognised that further work remained to be done and suggested an implementation plan and a staged approach to the finalisation of the reforms, under the guidance of a new governance body for the AQF.</p> <p>In the joint submission also made to the Universities Accord Panel by Johnson, Lodge & Kift for a National Centre for Student Success, it is suggested that the implementation of a revised AQF could be an early focus for the Centre and aligns directly to its mission in improving the quality of learning and teaching and facilitating inter-sector and cross-sector collaboration.</p>
<p>19, 36, 37</p>	<p><i>More coherent, dynamic, effective and collaborative regulatory and governance approaches</i> (AQF Review Recommendations: Recommendations 9-20)</p>

The AQF Review Panel carefully considered the various governance and regulatory issues that would arise consequent on implementing the Review's recommendations: for example, the AQF is referenced in a number of industrial awards and professional standards; aligns with other national qualification frameworks; and is reflected in many administrative systems and reporting systems. Taking the complexity of those matters into account, it developed a **three stage implementation and transition plan for reforms to be finalised under a new AQF governance body** (see, for example, p 48; Chapter 7), and an **impact assessment was conducted** (see [dandolopartners/ Ithaca Group, AQF Review Impact Assessment \(2019\)](#)). Specific recommendations were made by the AQF Panel around shorter-form credentials (including micro-credentials), AQF Policies and supporting documents, the implementation of reforms and ongoing AQF governance. In particular, the Panel recommended (Recommendation 21) that there should be **"Strengthen[ed] alignment between the AQF, the Higher Education Standards Framework and the Standards for Training Packages and RTOs"**. This latter was particularly as regards credit recognition and RPL, but was also considered necessary more broadly.

The AQF Review Panel met with both regulators ASQA and TEQSA, which advised that it would be possible and "preferable to accommodate changes in the usual cycle of accreditation" (p 48).

As the Panel would be aware, the 2008 [Bradley Review](#) recommended that there be a "streamlining" of regulation, especially where "providers operate across sectoral or state and territory boundaries" (pp 183-184; Recommendation 43), stating that

...responsibility for regulation of the whole tertiary system needs to be consolidated at a national level to ensure that it is dealt with in a more integrated and streamlined way... Under a national tertiary regulatory body, the VET and higher education sectors would retain their distinctive characteristics and the regulatory body would need to have the capacity to work across these differences."

This remains the optimal view. Like the Bradley Review, contextual research prepared for the AQF Review Panel and stakeholder submissions made also raised concerns, particularly around current AQF Levels 5, 6 and 8, including at (p 48):

- *differences in eligibility, funding (particularly student support payments), and the process of qualification development between VET and higher education*
- *possible confusion about awards with the same name in VET and higher education and whether a qualification type delivered in both sectors should be differentiated between the sectors*
- *different approaches to approving courses of the same qualification type taken by ASQA and TEQSA*
- *whether the Advanced Diploma and Associate Degree at Level 6 can be sufficiently differentiated or are both required*
- *different nature of diplomas offered in VET and higher education, with VET diplomas tending to be a higher-level field specific qualification, and higher education diplomas tending to be broader generic qualifications...*

In the AQF Panel's meeting with ASQA and TEQSA, the regulators noted that difficulties also arise in accrediting courses that can be offered in either sector if the course developer does not consider sufficiently the requirements of the sector. In response, the Panel suggested that "The information currently provided in qualification types about responsibility for accreditation and development could be amended to highlight which regulator was responsible" (p 46). In a similar

vein, the AQF Panel also suggested that whether the course offered was required to be accredited could be noted in the qualification type description.

Harmonising HE Standards Framework regulation with Professional Accreditation

One additional matter that could be usefully pursued further for greater regulatory coherence is the harmonisation of professional and HE regulatory requirements.

TEQSA has shown commendable commitment to [engaging with professional bodies](#) to work towards “complementary approach[es] to course accreditation processes and requirements” and to encourage “alignment of professional outcomes with learning outcome requirements of the [AQF]”. In this regard, TEQSA has signed Memoranda of Understanding with a number of industry and professional accreditation bodies “to facilitate the sharing of information and reduce regulatory burden on higher education providers through joint and streamlined approaches to assessment”.

In a similar vein, in 2016, Universities Australia (UA) and (then) Professions Australia (PA) (now the [Australian Council of Professions](#)) signed a [Joint Statement of Principles for Professional Accreditation](#) (Joint Statement) signalling closer collaboration between those two peak bodies and a shared “responsibility to develop complementary approaches to course accreditation... [and] alignment of professional standards and the learning outcomes requirements of the Higher Education Standards Framework” (Joint Statement, p 5).

The HE Standards Panel has said that the Joint Statement is “well regarded by the sector... [and] designed to ensure that professional accreditation processes operate in a transparent, accountable, efficient, effective and fair way’ ([HESP’s Advice on the Impacts of Professional Accreditation in Higher Education](#), 2017, p 2). In its [2017 Advice to the Minister](#), the HESP made three recommendations, which were then accepted by government and have since been progressed by TEQSA. In short form those recommendations were that

- A legislated code of practice, in the form of a disallowable instrument, be developed to limit professional accreditation bodies to raising matters that are profession-specific, rather than those already assured by TEQSA against the HES Framework;
- TEQSA work with accrediting bodies to build their capacity to work more effectively and efficiently – by establishing formal guidance, participating in workshops, encouraging a focus on outcomes-based quality assurance, and promoting best practice regulation;
- A stakeholder forum be held to discuss the future of professional work and ways to further streamline accreditation.

The HESP also encouraged further development of the Joint Statement to underpin the proposed legislative option.

Though many industry professional accreditation bodies have signed MOUs with TEQSA, many also have not and the latest agreement recorded on the [TEQSA website](#) is September 2019. It would be good to refocus efforts in this regard.

Complementary Recommendation: Develop a National Lifelong Learning Strategy

It is also recommended that the development of a National Lifelong learning Strategy be endorsed to support Accord aspirations for skills development, lifelong learning and a strengthened tertiary system.

Numerous reports from think tanks (e.g., [the McKell Institute](#) (2019)), business groups (e.g., [Business Council of Australia](#) (2017)) and others (e.g., the [Statement of Common Interests Between the ACTU, Ai Group, ACCI and BCA On Skills & Training](#) (2022)) have echoed international calls for the development of a **National Lifelong Learning Strategy** to bring coherence to the disparate and fragmented agendas currently being progressed around skills reform and lifelong learning. The articulation of a National Lifelong Learning Strategy across and between education sectors could inform and coalesce national action across secondary and tertiary (HE & VET) for initial entry-level qualification and then for ongoing up- and re-skilling. The role of both entry-level industry credentials and other micro-credentials could be captured and the enablers of equitable access to quality career advising across the lifespan and a national skills taxonomy could be identified.

In a complementary vein, the [Monash Commission](#) (2018) recommended the introduction of a universal learning entitlement and a lifetime learning account, further lifelong learning enablers. The development of a national strategy aligns with international action in this regard (e.g., the Scottish Funding Council's current [Review of Coherent Provision and Sustainability](#)). UNESCO also has a [Collection of Lifelong Learning Policies and Strategies | UIL \(unesco.org\)](#) available for reference.

It is noted that, in 2018, the [National Centre for Student Equity in HE](#) (NCSEHE) developed a **long-term strategic vision for student equity in Australian tertiary education** via an extensive national collaborative process. That vision for *Student Equity 2030 – The Best Chance for All* – built on the Commonwealth's *A Fair Chance for All* (1990) and the Bradley Review (2008) and proposed a national policy statement for student equity in Australian tertiary education. That vision advocates that:

Advancing Australia's future depends on all its people, whoever and wherever they are, being enabled to successfully engage in beneficial and lifelong learning.

Contributing to: *A fair, democratic, prosperous, and enterprising nation; reconciliation with Indigenous Australia; and cultural, civic and intellectual life.*

Achieved by: *An inclusively designed system with multiple entry and exit points; proactive removal of barriers to participation; and tailored support where needed.*

Accountable through: *An integrated approach to measuring success at institutional and national levels to align performance with policy objectives.*

This broad equity roadmap holds even more true today in the context of the global pandemic and national knowledge and skills needs (Kift, Zacharias, & Brett, 2021, [The Best Chance For All: A Policy Roadmap for Post-Pandemic Panic | Student Success \(studentsuccessjournal.org\)](#)). Assuring equitable access, participation and attainment for *all* learners, especially those identified as belonging to one or more of the current six equity groups (identified in 1990 and only slightly modified since) is integral to the delivery of a functioning and inclusive education ecosystem, which includes a connected and strengthened tertiary system. Over COVID-19, the disadvantage experienced by those on the margins of HE has been exacerbated by the effects of technological disruption to economic and social systems.

It is suggested that a National Lifelong Learning Strategy should take into account the *Student Equity Vision 2030 – Best Chance for All*. The full implementation of the AQF Review is a mutually reinforcing piece of necessary policy infrastructure.

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