



# Review of the Australian Qualifications Framework

Discussion Paper

DECEMBER 2018

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

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

To make a submission to the Review, please email this form to [AQFReview@education.gov.au](mailto:AQFReview@education.gov.au) **by 15 March 2019**.

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

Please limit your response to no more than 3000 words.

## Respondent name

Professor Grady Venville

## Respondent organisation (where relevant)

**The Australian National University**

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

The AQF is well recognised worldwide as a robust qualifications framework that helps interested stakeholders to determine and verify legitimate Australian qualifications.

The AQF serves to clarify the details of each qualification and gives an indication of achievement of learning of graduates at each level.

It is useful for accreditation bodies as mentioned in the discussion paper, certifying that graduates have skills to work in certain areas.

The main areas where the AQF is currently not fit for purpose includes the qualification descriptors, especially level 8; the volume of learning; and recognition of short form credentials.

**2. Where the AQF is not fit for purpose, what reforms should be made to it and what are the most urgent priorities? Please be specific, having regard to the possible approaches suggested in the discussion paper and other approaches.**

The following reforms are the most urgent:

- Revising the qualification descriptors to simplify them and ensure clear distinctions between levels, in particular, level 8 qualifications need some attention.
- Revision of the volume of learning and introduction of a universal standard credit model.
- **If** an improved approach to measuring volume of learning and a methodology to determine the level at which short form credentials are offered is implemented as part of this review, these two factors would, together, create a framework that would enable greater flexibility and cross-insitution credit recognition for short form credentials without having to include a wider range of credentials in the AQF.

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

ANU strongly supports further consultations with the sector before the final report goes to the Minister in September 2019. Any draft document resulting from this round of consultations should be circulated to the sector for further feedback/input to ameliorate any unintended consequences.

The Review Panel might also like to consider how the AQF will be supported going forward. Given the fluid nature of the workplace and rapid changes that are being witnessed, the AQF will need to remain flexible and responsive. With the AQF Council activities having been subsumed by the Department of Education, the AQF has not been resourced appropriately to ensure it remains at the forefront of best practice in qualifications frameworks internationally.

**Other**

Discussion paper response – Areas for possible change	
<p><i>Wider range of credentials for the AQF?</i> Including shorter form credentials: <i>MOOCS</i> <i>Micro-credentials</i> <i>Short courses</i> <i>Professional courses</i></p> <p>Possible approaches:</p> <ul style="list-style-type: none"> <li>• <b>Include shorter form credentials in the AQF</b></li> <li>• <b>Use the existing criteria for adding a qualification type to the AQF, possibly adapted for shorter form study, to determine whether shorter form credential types should be added to the AQF</b></li> <li>• <b>Align shorter form credential types to the AQF levels by assigning them across a number of applicable AQF levels</b></li> </ul>	<p>TEQSA and ASQA have indicated no appetite for quality assuring short form credentials or microcredentials and ANU strongly agrees with this position.</p> <p>ANU notes that short form credentials have been offered by a variety of organisations for as long as education has been institutionalised. A number of factors have resulted in greater focus on short form credentials in recent years including the massification of offerings through advanced technologies, a push for more personalized, flexible and on-demand qualifications, as well as new terminology such as ‘microcredential’.</p> <p>ANU agrees with the research from PhillipsKPA mentioned in the discussion paper that there are currently no consistent, cross institution methods within the education system to quality assure credit towards formal qualifications for in-service, informal, or microcredentials. However, we note that universities each have highly developed and consistent internal methods for assessing credit towards formal qualifications and that their approaches are monitored by TEQSA.</p> <p>ANU also supports the University of Melbourne’s position that the development of robust, scalable and innovative approaches to recognising credit will support the validity and acceptance of shorter form qualifications such as microcredentials. The ANU understands that the Sydney based Universities Admission Centre (UAC) is already looking at using blockchain technology to automate credit recognition and we welcome these developments.</p> <p>ANU, as a self accrediting university, is of the view that it must retain the</p>

<ul style="list-style-type: none"> <li>• Determine what groupings of shorter form credentials are required, and create them as credential types in the AQF</li> <li>• To help to aggregate shorter form credentials into qualifications, create a shorter form credential type that is defined by its link to a qualification type</li> </ul>	<p>autonomy, with oversight from TEQSA, to determine the level, volume of learning and learning outcomes of any short form credentials, as it currently does, so that credit can be awarded into any formal qualifications we offer.</p> <p>ANU recognises this autonomy may be in tension with the perceived need for a consistent, cross institutional approach to recognising credit. However, we also recognise that if an improved approach to measuring volume of learning and a methodology to determine the level at which short form credentials are offered are implemented as part of this review, these two factors would, together, create a framework that would enable greater flexibility and cross-insitution credit transfer.</p> <p>ANU agrees with the comment in the consultation paper that ‘inclusion of any shorter form credentials in the AQF should be driven by learner needs and provider responses to those needs, and not by an intention to expand the scope of programs subject to formal regulation and quality assurance through the AQF.’</p> <p>We agree that it would be difficult to assign a MOOC or an enabling course to a particular AQF level given they can be delivered at a range of levels and this supports our view that the institution must retain the autonomy to determine the volume of learning and the level of credit for any short form credential.</p> <p>ANU notes that sub-levels within each AQF level is an added layer of complexity. For example, if you split a qualification (e.g. a bachelor degree) into the underlying units of study, and the units of study into individual teaching activities, not all those teaching activities would be at the same AQF level as the qualification as a whole. Most qualifications have introductory or transitional units of study, and most units of study teach introductory or foundational material before increasing in depth and complexity. It is the qualification program as a whole that defines the AQF level.</p> <p>Further, it could be the way that shorter form credentials are “stacked” that defines the AQF level of the sum of the shorter form credentials. This is complimentary to the notion in the discussion document that describes how some systems define shorter form credentials in relation to a major qualification. However, the alignment with the major qualification could vary (level 8 or 9, for example) depending on the particular ‘stack’ of shorter form credentials. This would necessitate the comparison of the learning outcomes of the short form credentials with the formal qualification to provide the basis for making judgements about alignment and credit rather than the length or volume of learning.</p> <p>Whilst the paper mentions the New Zealand AQF and the inclusion of micro-credentials, as of November last year, it is important to note that the NZ accrediting authorities had received only three applications from small trades</p>
---	--

	<p>based companies for accreditation of their short courses. Therefore, the ANU would caution against using the NZ framework as a model for the Australian one until such time that it has been tested more deeply and broadly.</p>
<p><i>Enterprise and social skills</i></p> <p>Possible approaches:</p> <ul style="list-style-type: none"> <li>• <b>Specify that social and enterprise skills in AQF qualifications should be able to be:</b> <ul style="list-style-type: none"> <li>○ Taught in the context of the qualification’s core content</li> <li>○ Acquired through the process of teaching and learning</li> <li>○ Assessed and reported in ways that are fair, valid and reliable.</li> </ul> </li> <li>• <b>Expand the list of enterprise and social skills included in the AQF and provide guidance or advice about delivering them through various qualifications (but do not include these skills as taxonomy)</b></li> </ul>	<p>The ANU notes the growing demand for enterprise and social (soft) skills (ESS) recognition, but we agree with the Panel that the AQF should not prescribe a universal set of enterprise and social skills.</p> <p>Concerns were raised by ANU staff during consultation regarding the possible inclusion of ESS in the AQF. ESS are inherently affective capabilities as well as cognitive. The work of Krathwol (1964) offered a hierarchical taxonomy for affective learning, but its imprecise terminology, lack of simple empirical measurability, and emphasis on self-assessment and evaluation, has led to it being seen as secondary to the more familiar work of Bloom on measurable cognitive behavioural outcomes.</p> <p>With this in mind, we support the suggestion that the list of ESS included in the AQF could be expanded and guidance/advice provided about delivering ESS through various qualifications (but these skills <b>not</b> be included as a taxonomy).</p> <p>The discussion paper makes no mention of Work Integrated Learning (WIL), which is an appropriate context for the teaching and learning of ESS. We note a distinction could be made between professional and non-professional qualifications, as in some countries (e.g. South Africa). If such a distinction was adopted, WIL (with an emphasis on ESS) could be a formal outcome of professional degrees included in the AQF.</p> <p>Application of ESS is dependent on context only to a certain degree and the issue is not as clear-cut as the discussion paper implies. For example, critical thinking skills are transferable and can be taught/learnt and applied to different contexts. Another example is that systems thinking or design thinking approaches are universal whether you are a school teacher solving a problem with students or a mining engineer solving problems on an oil-rig.</p> <p>All students should have the opportunity to develop their ESS further through their educational endeavours. However, these skills do not clearly align with a structure such as the AQF.</p>
<p><i>AQF taxonomies and levels</i></p> <p>Possible approach:</p> <ul style="list-style-type: none"> <li>• <b>Use AQF levels only to describe knowledge and skills and their application and</b></li> </ul>	<p>ANU agrees with the Panel that duplication within the descriptors for levels of qualification types is confusing. We support revising the descriptors to simplify them and to ensuring clear distinctions between levels.</p> <p>The discussion paper suggests doing something similar to New Zealand where a level 6 Diploma must contain at least 120 credit points from level 5 or above with at least 72 credits being level 6 or above. This approach may help achieve a more consistent level of complexity of learning/knowledge</p>

<p>provide a description of each qualification type that is linked to the levels</p> <ul style="list-style-type: none"> <li>• Review the application of knowledge and skills domain of the AQF taxonomy and how it should be applied across the AQF levels.</li> <li>• Revise descriptors to simplify them and ensure clear distinctions between levels.</li> <li>• Revise the senior secondary school certificate descriptor to recognise that the knowledge and skills acquired in the SSCE can be at a broad range of AQF levels and result in multiple pathways.</li> </ul>	<p>between qualification types at the same level.</p> <p>The clustering of graduate certificates and graduate diplomas with bachelor honours degree at AQF Level 8 is problematic. A bachelor honours degree that culminates in the writing of a substantial thesis is considered within the sector as a research pathway for high attaining students. We are of the view that a bachelor honours degree that includes a substantial thesis should be more closely aligned with level 9 masters degree (research) and level 10 doctoral degrees. Graduate certificates and graduate diplomas may be more closely aligned with level 9 masters degree (coursework) and masters degree (extended). However, these alignments would need to be flexible as all of these level 9 degrees are offered by universities as pathways for students to professional practice, research, scholarship or further learning.</p>
<p><i>Volume of learning</i></p> <p>Possible approaches:</p> <ul style="list-style-type: none"> <li>• To continue to provide guidance on the breadth and depth of a qualification, change the volume of learning unit of measurement from years to hours</li> <li>• To provide a common baseline for volume of learning, base the number of hours for a qualification type on the needs of a new learner</li> <li>• To help facilitate pathways between levels and qualifications, develop an hours-based credit</li> </ul>	<p>The review of the AQF provides an opportunity to reconsider volume of learning. ANU supports the idea that the AQF continues to provide guidance on breadth and depth of a qualification. ANU supports changing the volume of learning unit of measurement from years to hours and the development of an hours-based credit point system. ANU supports providing a common baseline for credit points, and basing the number of credit points for a qualification type on the needs of a new learner.</p> <p>It is appropriate to continue with a minimum volume of learning requirement for formal qualification types (bachelor, master etc), as to do otherwise would likely result in Australian degrees not being competitive or alternatively not be well-regarded internationally.</p> <p>Improving the approach to volume of learning will significantly support quality assurance regarding short form credentials and the application of credit from short form credentials into formal qualifications.</p> <p>A system as set out in the AQF to which providers can match their existing systems is something that could be considered, as per the Panel's recommendation. For example, 1 credit point = 10 hours of learning as per the NZ and the EU models. It would make sense to aim for some international consistency and ANU strongly supports an international</p>

<p>point system in the AQF that may be voluntarily referenced by providers</p> <ul style="list-style-type: none"> <li>• To provide a common baseline for credit points, base the number of points for a qualification type on the needs of a new learner.</li> </ul>	<p>approach.</p> <p>The 1200 hours of study per year is useful, but needs further clarification. A distinction may need to be made regarding the mode of study (campus based, on-line, blended) and indicative ratios of formal teaching, directed and independent study. The extent to which variation from indicative load is allowable would also assist the design process.</p> <p>Moving to hours rather than years, and/or a credit point system has considerable potential benefits, but also has risks in that to maintain quality assurance, credit points would have to be standardised through a universal measure such as some unit of time. Otherwise, the meaning of credit points would diverge depending on sector or the particular provider. If it is standardised in this way it does not address the argument from some that volume of learning is an inappropriate measure (it is just a different unit to measure volume of learning).</p>
<p><i>Universal standard credit model</i></p>	<p>Australian universities assign a wide range of arbitrary credit values to learning, which form part of key student record systems. ANU has six credit points per unit of study, other universities use multiples of two, while 12 credit points per unit of study is also common.</p> <p>Unless enforced across the sector, a standard credit model will be difficult to implement. In the absence of this, universities will need to improve recognition of prior learning, possibly with guidance from TEQSA. If the recommendation of the review is that Australia moves to a credit point system, the only way to provide value with such a system is to make it a national system (with a period of transition); an optional system risks becoming meaningless or confusing.</p> <p>There is a need to consider unifying the terminology with TEQSA in regards to definitions of credit. There are disparities between definitions as found in the AQF <a href="https://www.awf.edu.au/sites/aqf/files/credit-transfer-explanation.pdf">https://www.awf.edu.au/sites/aqf/files/credit-transfer-explanation.pdf</a> and TEQSA's guidance note on credit and recognition of prior learning at <a href="http://www.teqsa.gov.au/for-providers/resources/guidance-note-credit-and-recognition-prior-learning">http://www.teqsa.gov.au/for-providers/resources/guidance-note-credit-and-recognition-prior-learning</a></p> <p>In particular we feel it is important to differentiate between waiving a unit of study and having it count towards the requirement of a qualification (advanced standing) as this shortens the volume of learning of the qualification; and, waiving a unit of study but requiring that it be replaced with another unit of study (exemption) as this does not shorten a degree. This distinction makes a difference to students in terms of the length and cost of their qualification.</p>



