



Australian Government



Australian
**Small Business and
Family Enterprise**
Ombudsman

18 March 2019

AQF Review Panel
Department of Education and Training
GPO Box 9880
Canberra ACT 2601

By email: AQFreview@education.gov.au

Dear Professor Noonan

Australian Qualifications Framework Review

The Australian Quality Framework (AQF) review is timely and in line with the review of Australia's VET system. Small business is impacted by both reviews in terms of design and structure of qualifications and the training delivery schedule. For both reviews effective engagement with local employers and industry groups is required to identify and facilitate a quality education framework.

Given that the AQF key responsibility is to maintain national standards for qualifications relevant to the skills demanded by industry, the AQF must be flexible and ensure that emergent approaches (such as disruptive technologies) are speedily integrated into the framework. In this context we raise the following points:

- The framework should develop foundation skills, skill sets and qualifications to meet small business needs. The structure and components of the qualification framework must align to occupational outcomes and the technical skill level required to function effectively in the small business work environment.
- Small business has expressed strong support for skill set delivery rather than an entire qualification. Small business would welcome greater recognition within the AQF of skill sets and other sub qualification training outcomes.
- The AQF structure must ensure that the qualification descriptors are expressed in plain language, using common industry specific terms, to allow small business to differentiate between the performance outcomes at differing AQF levels.
- Care must be taken to strike a balance between the volume of learning and recognition of prior learning, on-the-job workplace skills and life experience. RTO's, in a highly regulated training environment may see volume learning as a set requirement, and disregard prior learning resulting in extended timeframes and increased training costs for small business.
- Any change must account for the resources and capacity of small business Registered Training Organisations (RTO's). Small business RTO's must be able to continue delivery of qualifications throughout the review and beyond. Note that the period of a review can have a significant negative impact on an RTO's income capacity and can put at risk its ongoing operation.

T 1300 650 460 E info@asbfeo.gov.au

www.asbfeo.gov.au

Office of the Australian Small Business and Family Enterprise Ombudsman
GPO Box 1791, Canberra City ACT 2601

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Jill Lawrence on 02 6121 5312 or at jill.lawrence@asbfeo.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Kate Carnell', written in a cursive style.

Kate Carnell AO

Australian Small Business and Family Enterprise Ombudsman