



Review of the Australian Qualifications Framework  
Professor Peter Noonan  
AQF Review Panel  
by email: [AQFReview@education.gov.au](mailto:AQFReview@education.gov.au)

15 March 2019

Dear Professor Noonan

Deakin is pleased to make a submission to the review of the Australian Qualifications Framework (AQF).

The AQF has served Australia well, and Australian qualifications are globally respected. However, the world is changing and the AQF needs to adapt to at least maintain the reputation of Australian education and training systems. The AQF confronts a social and economic context where learning and career trajectories are dynamic and non-linear. The AQF should ideally accommodate qualifications and credentials that efficiently provide learners with quality assured skills to enter and maintain a place in the labour market.

In considering the Review's question of **whether the AQF is fit for purpose**, Deakin has examined the performance of the AQF against its current objectives, summarised in Appendix A.

The AQF is broadly delivering on some of its objectives but is performing less effectively on others. For example, there is compelling evidence in the ITHACA report (*Credit Pathways in VET and Higher Education*) that pathways intended by the AQF have not materialised. The AQF contributes to misalignment of VET and higher education systems by forcing linear relationships between qualifications and students struggle to create meaningful pathways. This negatively impacts on other AQF objectives such as students' lifelong learning and graduate mobility.

Deakin recommends that the AQF objectives be redefined as the starting point for facilitating technical and detailed changes within the AQF with refinement of some existing objectives and the addition of new concepts reflecting current priorities. If, for example, an objective of the AQF was to enable value for money in the public financing of qualifications, different approaches to credit transfer, recognition of prior learning, and integration of micro-credentials could apply within long-form qualifications. Recommended changes to the objectives of the AQF are described in Appendix B.

In considering the Review's question of **what reforms should be made to the AQF**, Deakin makes the following recommendations that flow as a result of proposed changes to AQF purposes:

***Better definitions of knowledge, skills and application:***

The definitions of knowledge (what graduates know), skills (what graduates do) and application (what graduates know and do in context) overlap and should be streamlined. Deakin recommends a taxonomy based on depth of knowledge and skill (consistent with existing AQF levels) and application of skill and knowledge (consistent with existing course specifications across qualifications at Levels 8

and 9). An indicative taxonomy based on these features is included in Appendix C. A streamlined taxonomy would simplify the AQF and reduce repetition significantly.

***Better recognition of building blocks of qualifications:***

The AQF should better acknowledge that qualifications are composed of specific components and experiences that include, but are more than, units (subjects) and forms of credit. Sub-qualifications span enabling courses and professional qualifying programs and should be referenced in the AQF.

Micro-credentials can act as standalone signals of achievement that are of clear value to learners and employers, can be used as credit towards qualifications, and should also be referenced in the AQF. Deakin has designed micro-credentials to be an integral feature of several AQF qualifications. The rigour, assured integrity and application of Deakin credentials is outlined in Appendix D.

***Clearer qualification specifications:***

Deakin recommends that qualification specifications be described more clearly and with less duplication as outlined in Appendix E. A coherent description of how a qualification can be conferred on the basis of units, micro-credentials, credit for prior learning, credit for bridging or qualifying programs, and other assessable experiences would enable innovative forms of delivery whilst maintaining coherence of qualifications. Volumes of learning should be described in terms of typical durations by which new learners can meet qualification learning outcomes, but include caveats that some may take longer or shorter routes depending on recognition of existing skills and knowledge. These changes should go some way to reducing overlap and duplication evident in various qualifications, particularly at Levels 8 and 9.

I commend this submission to the review and welcome opportunities for Deakin representatives to speak to this submission should the need arise.

Yours sincerely

A handwritten signature in blue ink that reads "Jane den Hollander". The signature is written in a cursive style with a large initial 'J'.

Professor Jane den Hollander AO  
**Vice-Chancellor**



## APPENDIX A: AQF PERFORMANCE AGAINST CURRENT OBJECTIVES

Objectives of the AQF	Performance against objectives
Accommodates the <b>diversity of purposes</b> of Australian education and training now and into the future.	<b>Somewhat effective</b> Schools, vocational and higher education represented, but domains of knowledge and their application (vocational, professional, disciplinary) are not adequately represented.
Contributes to <b>national economic performance</b> by supporting contemporary, relevant and nationally consistent qualification outcomes which build confidence in qualifications.	<b>Effective</b> Australia has experienced a quarter century of economic growth underpinned by education attainment.
Supports the development and maintenance of <b>pathways</b> which provide access to qualifications and assist people to move easily and readily between different education and training sectors and between those sectors and the labour market.	<b>Ineffective</b> Connections and pathways between vocational and higher education are sub-optimal.
Supports individuals' <b>lifelong learning</b> goals by providing the basis for individuals to progress through education and training and gain recognition for their prior learning and experiences.	<b>Ineffective</b> Variable recognition of vocational qualifications within higher education. Many cohorts 'cycled' in low AQF levels with limited evidence of progression.
Underpins national <b>regulatory and quality assurance</b> arrangements for education and training.	<b>Somewhat effective</b> AQF is a reference point across education policies, but notable failures in education and training include VET FEE-HELP. Unnecessarily repetitive and ignores domains important to national regulatory and quality assurance purposes.
Supports and enhances <b>the national and international mobility of graduates</b> and workers through increased recognition of the value and comparability of Australian qualifications.	<b>Effective</b> Australian qualifications nationally and internationally recognised, with strong growth demand.
Enables the <b>alignment</b> of the AQF with <b>international</b> qualifications frameworks.	<b>Effective</b> AQF aligned with international reference points.



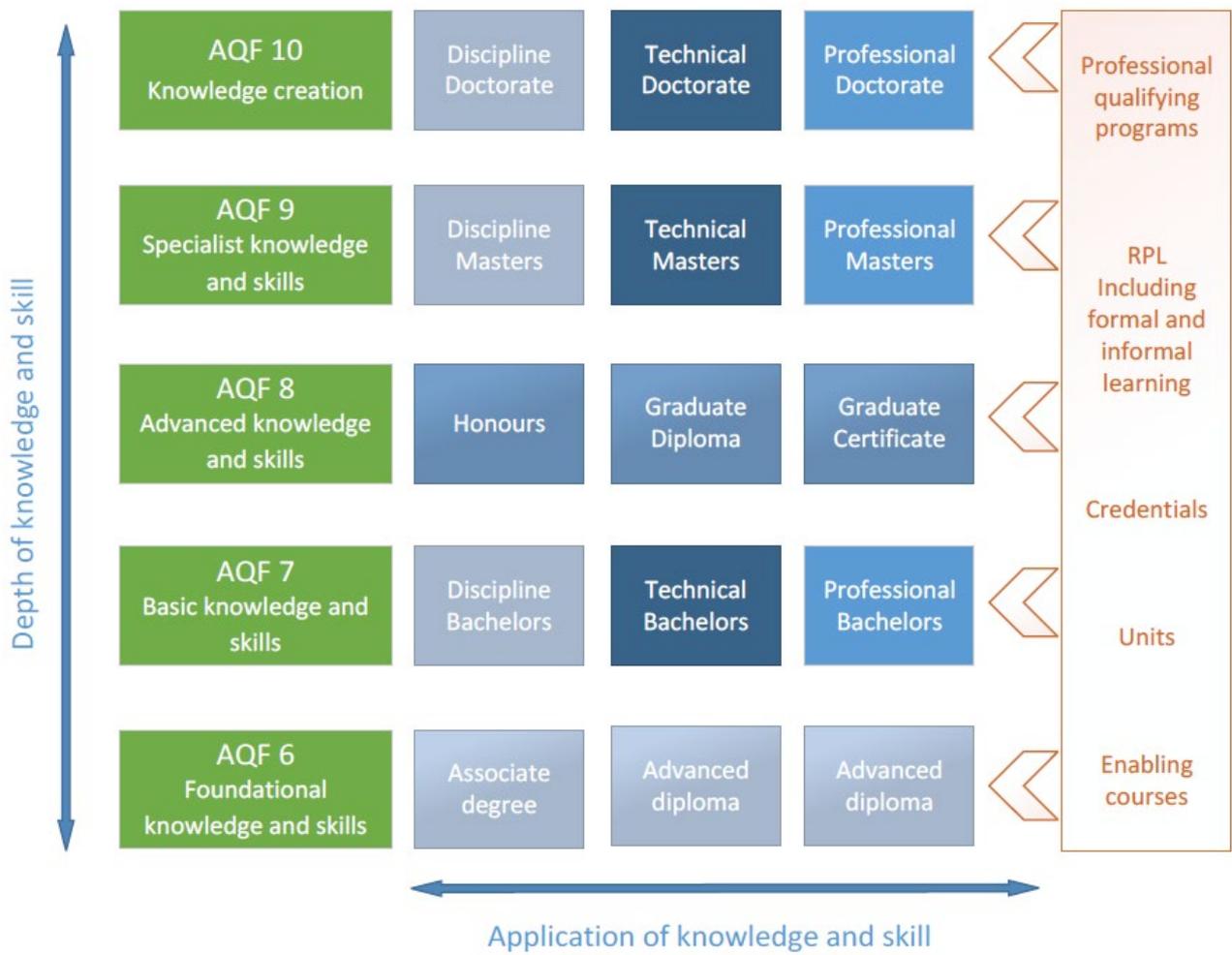
**APPENDIX B: REDEFINED AQF OBJECTIVES**

<b>Refining AQF Objectives</b>	<b>Rationale</b>	<b>Implications</b>
<b><i>Refine 'diversity of purposes'</i></b>	The purposes of various education sectors are conflated and confused in a 1 – 10 hierarchy.	A more nuanced description of purposes (foundational, vocational, academic, professional) would better reflect and direct pathways across and between qualifications.
<b><i>Include 'equity and social mobility'</i></b>	AQF references to pathways imply concern for equity and social mobility, but equity is not currently referenced within purposes nor broader AQF.	Including equity and social mobility as an objective within the AQF would allow for integration of equity considerations within qualification specifications including entry, recognition of prior learning and reasonable adjustments.
<b><i>Include 'labour market mobility'</i></b>	Digital disruption increases the need for reskilling and upskilling, with neutral AQF references to pathways giving insufficient recognition to the magnitude of this problem.	Stronger references to labour market mobility challenges would support other desirable changes that include efficiency and performance indicators.
<b><i>Include 'efficiency'</i></b>	The efficiency of achieving and awarding qualifications is not referenced by nor within the AQF, catalysing drift towards higher cost long-form qualifications, and limiting integration of micro-credentials within education policy.	Including efficiency as an AQF objective could both integrate and validate micro-credentials and other sub-qualification learning experiences as a contributor to retraining and upskilling of the Australian population.
<b><i>Refine 'regulatory and quality assurance requirements'</i></b>	Regulatory failures like VET FEE-HELP highlight challenges in the relationship between the qualification and the institutions with authority to issue qualifications and other requirements.	Greater specificity in the characteristics of institutions authorised to issue qualifications may mitigate risks of low-quality providers offering low quality qualifications.
<b><i>Include 'performance indicators'</i></b>	The absence of AQF performance indicators detracts from effective self-regulation and macro system quality assurance.	Referencing performance indicators within the AQF would allow for more coherent quality assessments of system, policy, institutions, and qualifications.



**APPENDIX C: INDICATIVE TAXONOMY BASED ON DEPTH OF KNOWLEDGE AND SKILL AND APPLICATION**

Deakin University recommends that the AQF include a clearer representation of domains of knowledge and their application as represented in the figure below which recognizes different types of application of knowledge at Levels 7, 9 and 10. Qualifications at Levels 6 and 8 use existing nomenclature and offer crossover points. Other forms of warranting learning benchmarked at the appropriate AQF level can feed into longer qualifications.





## **APPENDIX D: CREDENTIALING OF SOCIAL AND ENTERPRISE SKILLS**

Deakin University has developed and delivered a Professional Capabilities Framework, mapped to AQF across all levels and international qualification frameworks, as well as an outcome-based assessment methodology, which is reviewed and approved annually by our Academic Board. This Framework provides a model able to assess domains of knowledge and their application with particular relevance to what the AQF Review has termed social and enterprise skills. This framework is currently used in assessment and articulation pathways for Graduate Certificates and Masters of Professional Practice in IT Leadership, Digital Learning Leadership, Leadership and Engineering (Chartered). The latter has been built in association with Engineers Australia.

These credentials were scrutinised by TEQSA in Deakin's recent re-registration process. TEQSA found these credentials to be 'an innovative and market focused approach to acknowledging and accrediting graduate learning outcomes'.

The Deakin model has potential for application across the Australian education systems, including the Senior Secondary Certificate of Education. A pilot is underway with a secondary school in a Future of Work (FOW) Year 13 course, which focuses on real-world learning. The program helps students develop core competencies in areas such as self-management, communication, teamwork, problem solving and critical thinking. A central feature of the FOW program is the opportunity to gain professional work experience, exposure and expertise through the completion of an internship. Upon completion of the program, graduates will be offered an opportunity to assess the level of their social and enterprise skills capabilities using the Deakin model.

The first of their kind, Deakin professional practice credentials involve evidence-based assessment of skills capabilities at the relevant AQF level. The model relies on an assessment methodology that has been developed in conjunction with industry.

Further information on Deakin credentials and select courses in which they are utilised is available at:

**[www.deakin.edu.au/credentials](http://www.deakin.edu.au/credentials)**

**[www.deakin.edu.au/course/master-cyber-security](http://www.deakin.edu.au/course/master-cyber-security)**

**[www.deakin.edu.au/course/graduate-certificate-digital-learning-leadership](http://www.deakin.edu.au/course/graduate-certificate-digital-learning-leadership)**

**[www.deakin.edu.au/course/master-digital-learning-leadership](http://www.deakin.edu.au/course/master-digital-learning-leadership)**



## APPENDIX E: QUALIFICATION SPECIFICATIONS

Deakin University recommends that qualification specifications can be described with greater clarity but with less duplication sub-headings for each qualification would be comprised of:

### Level

Summary	Retain
Knowledge	Combine with skills
Skills	Combine with knowledge
Application of knowledge and skills	Retain

### Qualification Specifications

Purpose	Retain
Entry	Adopt from New Zealand ( <a href="http://www.nzqa.govt.nz/">www.nzqa.govt.nz/</a> )
Volume	Reframe in terms of new learners and exceptions
Pathways	Clarify purpose of qualification including context of relationship to other qualifications and social and economic mobility Clarify the building blocks of qualifications beyond units and credit
Accreditation	Retain
Authority	Clarify the institutional characteristics for qualification issuance