



# 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

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## Respondent organisation (where relevant)

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

The AQF provides an essential national framework for the quality control of qualifications across Australia, however, the framework was last reviewed seven years ago.

Given the dynamic tertiary environment and industry developments nationally and globally, this review is timely and provides an opportunity to revise the qualifications framework to deliver a more useful tool to standardise, quality control and support lifelong learning across institutional, sectoral and national borders, consistent with contemporary needs. International portability is essential for Australia to attract international students and to enable Australian graduates to easily access international education and employment opportunities.

Given the changes and developments in the education sector and in Australian

workplaces, the AQF is in need of reform to keep up with international developments, as highlighted in the contextual research for the AQF Review compiled by PhillipsKPA and published in 2018.

Particular areas of focus for the review include:

Nationally agreed credit points; recognition of enabling courses; micro-credentials; the nature of Diplomas/Advanced Diplomas; Honours level qualifications; volume of learning; standardisation of pathways and articulation arrangements; Government reporting coding standards and AQF levels; and lessons to learn from the New Zealand Model.

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.

#### Nationally agreed Credit Points

A nationally agreed, understandable credit point system would be beneficial for domestic and international students, industry and the higher education sector. Such a system would provide consistency and transparency in the award of credit points by providers and provide internal relativities between qualifications.

#### Recognition of Enabling Courses

There is a strong case to include enabling courses within the framework of a revised AQF. AQF qualification types have not changed since 2011 and there has been considerable growth in enabling courses across Australia since that time.

Enabling courses offer opportunities for university participation for students who experience additional disadvantage e.g. including, students with a disability, those with caring responsibilities and students in regional and remote areas. Enabling courses also contribute to improving retention and completion rates in bachelor degree courses as these students are also more likely to continue into second year than those admitted with an ATAR score, or on the basis of vocational qualifications.

Additionally, 17 of the 21 frameworks reviewed by PhillipsKPA address, or intend to address, general/foundation and enabling courses within their framework. The inclusion of enabling courses in the AQF would provide the necessary and appropriate recognition for this study level and bring Australia into line with European and international qualification frameworks.

#### Inclusion of micro-credentials

In order to have transparency, consistency and comparability of qualifications nationally and internationally, non-formal and micro-credentialing should be included in the AQF.

Micro-credentials vary enormously in their duration and outcomes and require regulation in the higher education, VET and industry sectors. ECU concurs with the criteria set out on p15 of the Discussion Paper.

The take up of micro-credentials is increasing globally and their inclusion in the AQF would provide quality assurance and thereby give providers, students and employers confidence in their status. This could be achieved through a matrix within the existing AQF, rather than a separate system, in order to maintain a single national framework. This approach is consistent with international trends and has the potential to attract more students to tertiary study and positively impact retention rates. It is crucial that learning outcomes remain at the core of national qualifications frameworks.

The New Zealand experience has been to have a separate framework for micro-credentials. This has been reconsidered and New Zealand is now moving towards including micro-credentials in the NZQA.

It is recommended that shorter form credentials are assigned to their applicable AQF levels and be required to demonstrate evidence of learning outcomes at the relevant level.

#### Nature of Diplomas/Advanced Diplomas

Existing interpretation and implementation of the award of Diplomas/Advanced Diplomas has resulted in some blurring of current AQF levels. A uniform VET and higher education sector definition that clarifies the differentiation of Advanced Diplomas from Diplomas would be beneficial and would provide one standard for both VET and higher education students.

#### Honours Level Qualifications

Current practice in Australia has led to a blurring at AQF levels 7 and 8 and the award of honours degrees that are awarded over four years, or in some cases three years. A differentiation of Bachelors or honours degrees is required. This could be resolved by addressing the volume of learning undertaken, or by introducing qualifications levels for "standard honours" and "extended honours". In dealing with Honours qualifications, consideration should also be made of differentiating these from Graduate Certificate/Diploma, also identified at the same level in the current AQF.

Some universities offer research bachelors at AQF levels 7 and 8 and clarification through this review will assist in differentiating these from other vocationally-oriented Bachelors and Graduate Certificates/Diplomas.

#### Volume of learning

Articulation of volume of learning in the AQF is outdated as increasingly, semesters are of varying lengths and universities organise their timetables around semesters, trimesters and multiple intake periods. The volume of learning should not be based on "time served" but rather, the demonstration of competencies, learning outcomes and associated workload. This is particularly relevant at Level 9 of the AQF. The AQF defines volume of learning in terms of equivalence of full-time years of study. This would be better expressed in terms of universal credit point values, as well as calendar time. This would bring the AQF more into line with international practice.

The European Credit Transfer And Accumulation System (ECTS) makes it easier for students to move between countries and provides a useful model for Australia.

### Standardisation of Pathways and Articulation Arrangements

Currently, pathway arrangements for entry to Australian universities are not standardised and many pathway arrangements are reliant on individual, locally-negotiated articulation agreements between higher education providers and registered training organisations. This review provides an opportunity to review the portability of VET qualifications (accepting that international qualifications will require different consideration) and to establish procedures for automatic entry or granting first year Advance Standing in a way that is transparent and consistently applied across Australia.

Prospective students from disadvantaged groups, including low-skilled workers, early school leavers, older unemployed, migrants, refugees, older workers and those with disabilities might be expected to benefit most from these new standards for recognition of prior learning and articulation, where currently information and advice is difficult to access and the processes can be particularly challenging to navigate and complete.

It is timely to develop a consistent approach to entry pathways and articulation arrangements.

### Degrees apprenticeships

Though well developed in Europe, Degree Apprenticeships are little known in Australia. This AQF review should consider whether this form of Work Integrated Learning should be represented in the AQF.

### Government reporting coding standards and the AQF

The current collection under the Higher Education Student Collection codes courses at a more detailed level than the AQF. For example, Graduate Entry Bachelors are differentiated from standard bachelors, as are Extended/New Skills course levels for Graduate Diplomas and Masters. While the level of details does not appear to be material to the AQF, the AQF review may wish to recognise these differences, as they impact learning volumes, credit points and advance standing.

### Lessons from the New Zealand Model

The New Zealand Qualifications Framework (NZQF) has been reviewed and appears, for the most part, to have been implemented successfully, with improved standardisation and simplification across all universities in New Zealand. Australia requires a qualifications framework that is more flexible than hierarchical, meets students, industry and sector needs, does not constrain but enables, and is consistent in its application within a regulatory framework.

#### Issuance Policy

This policy might be considered unnecessary given the inclusion of qualifications issuance matters in the HES and RTO standards.

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.

Standardisation of pathways will require a central database and it is recommended that this is developed and maintained by the Commonwealth Department of Education and Training.

#### Other

It is recognised that the current AQF is complex and rich in semantic detail (as noted by PhillipsKPA). It is not easily understood by the average reader, international audiences, or the wider community. In its printed form the AQF is four times longer than the NZQF. The latter provides a good model for the next iteration of the AQF. As noted in the PhillipsKPA document, the revised AQF would also benefit from expert editorial revision.

Engagement with the sector is critical to the success of any proposed implementation plan. It is recommended that there is further consultation with the sector, focused on the proposed implementation plan to maximise success of the plan, and enable the sector to appropriately plan for forthcoming change.

Rather than over complicate the revised AQF, supporting tools, guidelines and an implementation framework clearly linked to the regulatory framework, would be welcome.