Submission

Strengthening the AQF: a proposal

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1. Introduction

The Australian Council for Private Education and Training (ACPET) is the peak, national industry association for independent providers of post-compulsory education and training. ACPET represents more than 1,100 organisations, from schools to higher education institutes, delivering a full range of education, training and English language courses to both domestic and international students.

ACPET welcomes the opportunity to present a response to the Australian Qualification Framework (AQF) Council and its proposal paper - *Strengthening the AQF*.

ACPET is committed to building an education and training system in Australia which helps all individuals to establish rewarding, social and economic lives that contribute to a productive and socially inclusive nation. A strengthened Australian Qualification Framework (AQF) is needed to assist clients (individuals and employers with workers) to reach personal and career goals.

2. Key Messages

ACPET endorses a qualification framework which is internationally recognised, quality assured and provides the recognition needed by individuals to actively participate and gain the rewards of a lifelong journey of learning. A strengthened AQF needs clear linkages between, and consistent language statements of, learning outcomes across a learning taxonomy. Australia needs a qualification framework which will recognise the capacities, skills and knowledge of all Australians no matter how this learning has been achieved and also assist learners to continue with recognition and accreditation of their learning.

ACPET acknowledges the need for employers to be able to retrain and up-skill their workforce and support the need for industry to have a qualification framework which can assist workers to move across and between industries. However, the AQF must also serve the needs of the individual (domestic and international students) seeking acknowledgement of their learning for a range of purposes other than a job role i.e. credit towards further learning.

Australia provides educational services not only to Australian individual learners and employees, but also to an exacting international student industry which has developed due to the efforts of public and private education and training providers and with the support of the Australian government. Any qualification framework developed for the twenty first century cannot afford to be inward looking and must ensure it provides pathways, synergies and linkages that meet the needs of our international learners as well as our domestic students. It is vital that the AQF Council take into consideration the importance of these drivers for Australia.
ACPET endorses the need to strengthen the Australian Qualification Framework provided the framework:

a. Accommodates the different purposes and reasons why individuals choose to learn and seek accreditation;
b. Establishes clear career pathways to support workforce development;
c. Removes sector-based delivery of qualifications;
d. Demonstrates clear linkages between learning outcomes across a learning taxonomy;
e. Assists individuals to gain credit for all forms of quality assured learning;
f. Supports learners that may need to enter and exit accredited learning at multiple points by acknowledging the need to cluster and nest skills sets and qualifications;
g. Gains international acknowledgement including recognition of nomenclatures such as Graduation Statements;
h. Is supported by fair and equitable quality assurance systems including accrediting bodies which are able to determine equivalence and value of courses;
i. Uses a reference levels-based structure to facilitate and clarify relationships between qualifications including acknowledgement of entry level preparation programs to assist disadvantaged learners.

ACPET also encourages the AQF Council to strengthen the AQF based on the need for:

- One tertiary system with a need to streamline regulation across the higher education and vocational education and training (VET) sectors;
- Adjustments to qualifications and products in both the higher education and VET sectors including the Australian Qualification Framework (AQF) to allow for qualifications and products to be developed using a broader framework to encourage innovation and flexibility particularly in the development of courses above Certificate IV;
- Representative decision making and approval processes involving the users (clients and providers) of the system and including a breakdown of the heavily-burdened bureaucratic and regulatory structures which have been established and are currently limiting innovation, delivery and competitiveness of providers; and
- The right to choose a quality education and training provider which will enable the fundamental and inalienable right of individual learners and workers to be self-determining in a democratic market economy.
3. ACPET’s position on why the AQF should be strengthened

Australia needs a fit-for-purpose qualification framework structured around learning outcomes. With more complex life, work and productivity challenges, the Australian Qualification Framework (AQF) should not perpetuate old barriers to individuals or employers with workers looking to attain learning objectives and useful qualifications. Barriers to innovation and enterprise for any type of provider should be removed.

The Australian Qualifications Framework (AQF) provides a platform for a single system. The AQF supports a qualifications and outcome capacities framework that should enable tailored course development. There appears to be no reason against Australia steering all formal post-compulsory school education through one efficient, modern tertiary system in place of multiple sectors, to deliver a matrix of qualifications responding to evolving stakeholder needs.

**The need for one system**

Australia needs a fit-for-purpose qualification and quality system structured around user and supplier performance.

The Deputy Prime Minister (DPM), the Hon. Julia Gillard asked the AQF Council ‘to improve the articulation and connectivity between the university and VET sectors’ and the ‘ambit of Skills Australia to expand to encompass the full scope of Australia’s labour market needs, to give advice to the Commonwealth about the effectiveness of both the university and VET systems in meeting the broad range of Australia’s skill needs’\(^1\).

The DPM also stressed national alignment – the ‘need to be more nationally consistent and rigorous in the way we register, accredit and monitor courses and providers and the way we enforce performance standards’, however the division of sectors remains – ‘two systems, one shared vision’\(^2\).

ACPET recognises the intended directional changes, and sensitivities in these areas, but considers that Australia cannot afford to prolong artificial structures when innovative workplaces and students are moving ahead of the capacity of regulated systems to change.\(^3\) If in-depth review now proceeds on the basis of ‘two systems’, Australia’s education rules in 5-10 years will be further holding back advance.

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\(^1\) [http://www.deewr.gov.au/Ministers/Gillard/Media/Speeches/Pages/Article_090305_093449.aspx](http://www.deewr.gov.au/Ministers/Gillard/Media/Speeches/Pages/Article_090305_093449.aspx)

\(^2\) [http://www.deewr.gov.au/Ministers/Gillard/Media/Speeches/Pages/Article_090305_093449.aspx](http://www.deewr.gov.au/Ministers/Gillard/Media/Speeches/Pages/Article_090305_093449.aspx)

\(^3\) The HER Panel, throughout its report, actually unpicks reasoning for separate sectors. Bachelor degrees today, as much as diplomas and certificates, relate to industry expectations, and students want to be educated for work careers and professional degrees have long had vocational elements. Many of the VET courses that educated today’s allied professionals and managers across the spectrum, from accountants to surveyors to event managers, are now provided as degrees. A range of discipline degrees can be obtained by students in two years within double-degree sets. All types of qualifications increasingly involve education for thinking, integration, problem solving and teamwork as well as knowledge and skills – as demanded by all types of work including self-employment and small to medium enterprises (SMEs).
ACPET recognises policy issues around sector delineation, but a new national system should be built with an effective continuum of AQF qualifications and other features and without sector divisions. Opposition appears mainly to be on jurisdictional grounds.

Longstanding different industry and institutional linkages and sectors with authority [AQF Handbook] have entrenched ‘ways’ of course development, assessment, quality assurance, and application of the AQF itself. These reinforce ACPET’s position that the top impediment to innovation is the tired dual-sector division.

Meeting client needs

Today, clients of education and training services are more sophisticated, their needs are complex and as consumers they want tailored, easily accessible and creative, responsive, and flexible service. This statement is particularly applicable to the individual learner as well as the needs of industry.

In a number of recent reviews, the perspectives of individual students or workers have not been fully considered but rather the needs of employers (and industry) have been the driving force. The DPM has noted that ‘under our current system, student choices about whether to study and what to study are the primary determinants of how much and what sort of higher education is provided’ yet policy development has not as yet demonstrated any responsiveness to this determinant.

A school leaver today faces a half century of work – as business operators, specialist providers or various types of employees – and people age 40, have 25 years ahead. Individuals and families look beyond current employment, to work and life interests and to long-term career potential, often wider than their first field of training. Study and work interest, practical qualifications with status, potential mobility, flexibility and life earnings, are factors when choosing learning pathways. Fewer people now are prepared to be seen as ‘labour supply’, even if the pay is high.

The war is for ‘talent’, and looking forward, that talent will manifest in many forms, often as creative individualists, self directed workers, in teams or in global entities. Whether future skill needs will be ‘university’ or ‘vocational’ is an academic debate based on old structures. This observation is reinforced by the OECD priority given to building personal attributes relevant to a Knowledge Economy where it is in fact the ‘people’ who are the repositories of knowledge (and skills). The Bradley Higher Education Review also argued:

*That a (reconfigured) Tertiary Education Sector must shift its approach back to being demand driven by student choice (self-determination over what and where individuals choose to learn) if Australia is to have any hope of maintaining its current OECD position by retaining or increasing the level of*

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engagement and participation of people in education and training that is necessary in a Knowledge Economy post 2010⁶.

**Customisation and recognition of higher order skill development**

It is particularly important that the AQF explicitly expand vocational recognition of and responsiveness to the urgent occupational need for higher order skill development. This is needed to better facilitate advanced level technical training above Certificate IV level, in addition to the supervisory and management priorities currently privileged in Training Package qualifications at this level. Such technical training may be discipline specific, but may also be cross-disciplinary where technologies are rapidly converging.

Advanced technical qualifications at this level warrant a degree of customised specificity, best developed as innovative accredited courses designed for specific purposes. It is this approach which will help to negotiate change and resolve current and emerging issues with respect to sustainability across all sectors of the Australian economy.

Today, recognition of increased cognitive thought processes is needed for qualifications which are suitable for the Para-professional within the industry or the student utilising the VET qualification pathway as a transition to a higher education qualification. Also, the advanced development of employability skills needed for Para-professional and managerial levels of work and therefore more applied use of cognitive thinking on top of acquired knowledge and skill levels supports this case.

**A smoother transition between VET and higher education qualifications can result if there is recognition of cognitive thinking at all levels of qualifications, no matter what system of assessment is used.** However, the current requirements around Training Package qualification packaging and alignment, particularly above AQF Certificate IV level are acting as a barrier to the needs of learners, particularly if not yet set on distinct occupational goals, and the need of industries undergoing massive change.

ACPET supports a learning taxonomy based on the use of broader statements of learning outcomes, with different levels and combinations of skill development and cognitive thinking, underpinned by the employability (soft, core, generic, etc) skills and personal attributes. Independent providers, with their ability to quickly adapt, to be time responsive to the needs of clients (individuals and employers) and flexible in their approach to delivery, would welcome a strengthening of the AQF to allow for:

- Qualifications at AQF Level IV and above be re-designed to provide greater flexibility to cater for individual client needs;
- Accumulation of credits towards higher education qualifications; and
- A system of crediting all types of learning towards the achievement of a qualification level.

⁶ Higher Education Review – pg 7
Increased flexibility needed

ACPET supports the strengthening of the AQF but also recommends a partial deregulation of the education and training system, with revisions made to the Australian Quality Training Framework (AQTF) to permit accreditation on merit of differentiated VET courses especially above Certificate IV level i.e.: AQF Diploma, Advanced Diploma levels and above. Training Package qualifications at Certificate I-IV levels that have and continue to prove useful, particularly where pertinent to trades training with licensing implications, should be retained and maintained.

This suggestion for partial deregulation would progressively free up the sector, allowing the educational pendulum to swing back to a more productive and more competitive, middle ground with incentive for providers to innovate and invest in growing the scale of operations.

VET rules, regulation and Training Packages are anchored in trades training competencies and workplace locations. Trades are a small although important part of today’s skill needs. VET rules and regulations which provide protection for Training Packages, prohibit innovative providers from developing courses to meet changing needs of employers or the self-employed, from ‘adding value’ to Training Packages to enhance the learning and experience of international students, and make it difficult for providers to serve students who are not employed in a work place (despite policy aims for this group).

The evidence shows there are a serious number of under-utilised and patently unsupportable Training Package qualifications. 80% of publicly funded VET enrolments are in only 180 out of 1,592 Training Package qualifications with 70 qualifications not used at all in 2006. This alone is a very serious indictment of the lack of relevance and efficacy of the Training Package strategy. It challenges the integrity of the Packaging rules and does not augur well for the future.

Private providers, more than any group, are slowed by training package strictures, accreditation rules and the ways these are implemented. In response to calls from individuals and industries, education and training providers are attempting to shape courses to integrate thinking, capacity, skills and knowledge development. Market demand is seen in moves to add skills development plus industry-work segments, into learning programs.

With overseas students as an important export industry for Australia, and the policies and learning principles that Australia espouses urging focus on student needs, providers servicing international students are not allowed to add value to Training Packages, to better fulfil and interest the students (for whom regulations state, must receive 75% of teaching face-to-face, not in workplaces).

The frontline for the innovative education development that Australia needs is at interfaces of higher education and VET – integrating thinking, analysis and multiple skills. Whether future skill needs will

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7 NCVER Literature Review pp 11-12
be ‘university’ or ‘vocational’ is a debate based on old structures and regulatory arrangements. Courses and qualifications at high-skill interfaces of traditional VET programs and degrees offer options and strong work futures, and are tailored by innovative providers for groups of students to encourage wider education participation.

These signal the need for continual critical review of regulatory and administrative structures embedded in the AQF and of the escalating complexity of the Training Package system and competency assessment. Some Training Packages now amount to 1000 pages without teaching content. ACPET has provided input to multiple reviews on this issue including its response to the Skills and Workforce Development paper by the COAG Working Group:

ACPET supports development of a framework to enable vocational qualifications and products to respond to changing market demand for skills needed by businesses, industry and individuals in the 21st century including the need to: redefine the term ‘competence’ as currently used to acknowledge cognitive thinking and attributes; review the appropriateness of qualification levels and descriptors under the AQF particularly above Certificate III level; create more flexibility and portability within and across Training Packages to support the needs of industry and assist individuals move through industry and/or career pathways; encourage innovative learning and assessment practices to assist with the recognition of all types of learning; and develop a system of crediting all forms of learning as a means of gaining a qualification.

The AQF provides a firm working base, however the AQF descriptors are sector-based and currently add to difficulties in building pathways and providing credit between the sectors. There is a need for a more integrated framework to provide for more flexible and streamlined pathways. The Deputy Prime Minister (DPM), the Hon Julia Gillard has stated that:

A seamless post-secondary education system was one of the key ambitions of the Productivity Stream at the 2020 Summit, ... calling for a system that allowed people to move in and out of education at all levels throughout various stages of life and work.

The 2020 Summit report records that Australia’s “institutional arrangements need to be reformed”. It says “policy and funding should be driven by the needs of the individual rather than the institution” which refers to historical systems that have grown to reflect the interests of administrations or staff, ahead of needs of individuals, groups and the economy that depend on the systems for progress.

Reward learning and assist articulation

Strengthening the Australian Qualification System (AQF) should assist in the movement of students in institutional and jurisdictional terms. Articulation theory has achieved little, despite a rising need and interest in multi-skill learning. This indicates structural and regulatory problems. Issues around the fit and fitness of structured qualifications need to be addressed to meet changing workplace demands for skills and qualifications, the global mobility of workers and students and the imperative to recognise learning gained outside institutions.

We now operate in a very different world, with responsibility for success shared across the entire organisation, a differently skilled and motivated workforce … Delaat 2008

Australia needs an Australian Qualification Framework (AQF) without sector divisions embedded by regulation, funding or historical practice. The AQF should have a diversity of institutions deciding to focus on parts of the Australian Qualification Framework (AQF) and innovative ways of delivering learning for people with different learning styles to successfully attain AQF outcomes. This aligns with objectives of competition policy and good regulatory practice.

The sector distinction is also being actively blurred, especially by universities with only a few broad external regulatory requirements and the flexibility to move quickly into all learning arenas, if they so decide, and without higher education or VET system restraints.

ACPET supports awarding credit for a volume of learning provided the volume of learning is aligned to learning outcomes based on complexity and depth of knowledge and understanding, degree of necessary support or instruction, degree of integration and independence required, range and complexity of application and degree of transparency and dynamics of situations. ACPET does not support aligning credit with a measure of time i.e. 10 hours of learning equals 1 credit unless the concept of nominal times are clearly linked to demonstrated learning outcomes.

ACPET agrees with the need to align the AQF internationally and the use of a reference levels-based structure to facilitate and clarify relationships between qualifications. This type of structure would assist pathways and credit arrangements for individuals, institutions and employers with workforce planning.

10 The DPM notes that the "interface between vocational education and training and higher education institutions manifests itself in credit transfer and articulation arrangements, dual sector universities, multi-sector campuses, some limited sharing of infrastructure, some research collaboration and increasing overlap in qualifications offered". However, "the numbers of students that move between the two sectors is relatively small. The proportion of domestic undergraduate students admitted to higher education on the basis of prior vocational education and training study (articulation) was only 10.1 per cent in 2006. The proportion of students gaining credit (or exemption) for previous vocational education and training study was only 3.4 per cent in 2006. Also: DEST-Phillips KPA, 2006, Giving Credit where Credit is Due - A National Study to Improve Outcomes in Credit Transfer and Articulation from Vocational and Technical Education to Higher Education.

11 Wil Delaat, Managing Director, Merck Sharp & Dohme (Australia), in Fast Thinking, April 2008.
Encourage innovation and competitiveness

To genuinely facilitate innovation, quality, effectiveness, efficiency and student participation, Australia needs to evolve to a single national tertiary education system able to serve multiple stakeholders. In response to calls from industries, employers and students, a range of providers are endeavouring to shape courses to integrate thinking, skills and knowledge development across old divisions. Universities, with their flexibility, can shape mixed courses quite readily (and likely want to keep this competitive edge). TAFEs often also have delegated authority to accredit.

Public institutions stand aside from key parts of the regulatory system. The competitive and commercial advantage for public institutions (particularly universities and also TAFEs with delegated accrediting authority from their own departments), has become clearer as enterprising providers move to innovate. Some rules do not cover public entities; other exemptions appear to be custom and practice:

All Australian universities extensively breach the Australian Qualifications Framework. That’s not news, as universities mostly ignore the [AQF]. But it demonstrates a systemic failure of quality assurance and the lack of national maintenance of standards in higher education. ... [AUQA] has consistently declined to assess the standard of Australian degrees or even the relative standards of the Australian higher education system ... The state bodies accredit non-self-accrediting higher education institutions, most of which are private. These institutions are required to ... which puts them at a clear disadvantage vis-a-vis the self-accrediting but non-complying universities. Moodie, The Australian, 19 Nov 2008.

4. Response to proposal questions

Proposal 1: the AQF is aligned to policy goals

Q1. What changes should be made to the existing statement of objectives of the AQF to reflect national education and training goals? (Section 1.3, p 8)

ACPET agrees with the reasons put forward by the AQF Council to strengthen the AQF in terms of the need to keep pace with workforce developments, connectivity and linkages (mobility, lifelong learning), recognition of informal and non-formal learning and the impact of globalization (student markets and mobility of workforces).

However, in its submission, ACPET has also put forward other reasons (Section 2 and 3 – pg 3-10) to strengthen the framework, in particular the need to respond to the varying individual needs of domestic and international students, scope to develop ‘fit for purpose’ qualifications especially at the Para-professional level and changes to Training Packages to create more flexibility in the design of qualifications including the need to nest and cluster skills sets and qualifications.
ACPET would like to reinforce the need for the AQF to support the needs of individuals to enter and exit the accreditation of their learning process at multiple points which means a seamless system based on awarding credit for all types of quality assured learning whether delivered at an institution, at the workplace or through distance or e-learning systems. Most importantly, the AQF should not be sector-based as this restricts client choice and access.

**Proposal 2: the AQF is based on a taxonomy of learning outcomes and explicit reference levels with a measurement of the volume of learning**

**Proposal 2a: A learning outcomes classification or taxonomy is developed as the basis for the qualification descriptors in the AQF.** (Section 2.2, p 10)

Q2. **Should an explicit taxonomy of learning outcomes be used consistently to describe all qualifications in the AQF?** (Section 2.4, p 12)

ACPET support the development and use of taxonomy of learning outcomes provided explicit and consistent expression and language is used across the range of qualifications. ACPET encourages the AQF Council to ensure that international recognition and alignment of the AQF also considers developments of qualification frameworks in the Asia/Pacific region as well as the more advanced work completed on the European Qualification Framework.

Q3. **If an explicit taxonomy of learning outcomes is used, will students and employers be better served by Option A or Option B?** (Section 2.4, p 12)

ACPET supports an approach which uses taxonomy of learning outcomes based on knowledge and skills. The use of competence whether as a single dimension or divided into 2 separate dimensions should be researched further as there is no clear agreement on this item which is evident by the use of different terminology and instruments currently in place to measure this dimension i.e. Graduate Statements, Employability Skills. However, ACPET does support the concept that knowledge and skills must be developed and assessed in a range of contexts to ensure that transferability and application of knowledge and skills can be achieved.

**Proposal 2b: AQF qualifications are organised within the AQF by an explicit reference levels-based structure.** (Section 2.6, p 14)

Q 4: **How could explicit level descriptors for each AQF level enhance Australian qualifications and their use?** (Section 2.9, p 19)

ACPET support the need to use a reference levels-based structure provided it can be aligned internationally and is useful in clarifying relationships between qualifications. The use of clear language in this type of structure would also assist pathways and credit arrangements for individuals, employers and education and training providers.
Q 5: What number of explicit reference levels would best illustrate and encompass the increasing complexity of Australian qualifications? (Section 2.9, p 19)

ACPET does not have a set position on this question except for the need to align internationally and in particular with the direction of our Asia/Pacific neighbours. Australia has a high proportion of Indigenous Australians with poor literacy and numeracy levels, significant numbers of long-term unemployed with increasing unemployment levels due to the current global financial crisis and a low percentage of Australians engaged in productive work (65%). Due to these circumstances the AQF needs to be structures to acknowledge entry level preparation programs as valuable learning needed by individuals prior to engagement with higher level qualifications.

Q 6: What is the best process to use for locating each qualification type in a levels-based structure? (Section 2.9, p 19)

ACPET agrees that the suggested process for locating qualifications into a levels-based structure should be based on complexity and depth of knowledge and understanding, degree of necessary support or instruction, degree of integration and independence required, range and complexity of application and degree of transparency and dynamics of situations.

Proposal 2c: AQF qualifications are assigned a measure of the volume of learning based on the notional student learning time involved in achieving the qualification. (Section 2.10, p 21)

Q 7: Would a measurement of the volume of learning add value to AQF qualifications and support improved credit arrangements? (Section 2.11, p 23)

ACPET agrees that awarding credit for quality assured learning is necessary. A system needs to be developed which credits learning achieved through clearly stated outcomes in the AQF. Individuals need to enter and exit the AQF throughout their lives therefore it is important that whatever and however their learning has been developed and assessed (competency, graded, criteria-based) it is recognized by the knowledge and skills they can apply in a range of contexts – the stated learning outcomes at a particular level of the AQF.

Q 8: What is the best process to use to determine the credit point value, with reference to the level, for each AQF qualification type? (Section 2.11, p 23)

There is significant world-wide disagreement about how the volume of learning should be measured. The current European Credit Transfer System (ECTS) uses a combination of time and learning outcomes as a basic measure however there are still a number of countries and individual institutions which have not committed to the use of the ECTS.

ECTS credits are based on the workload students need in order to achieve expected learning outcomes. Learning outcomes describe what a learner is expected to know, understand and be able to
do after successful completion of a process of learning. They relate to level descriptors in national and European qualifications frameworks\textsuperscript{12}.

ACPET does not support awarding credit using a time-based measurement for volume i.e. 10 hours = 1 credit. This type of credit system does not align to the current competency-based system of assessment. ACPET does not support the use of graded assessment for competency-based assessment as this requires the use of 2 different assessment systems and records.

All assessment is based on the assessor making a judgement against a set of performance criteria for the evidence gathered. ACPET supports the development of a system which is based on clearly stated outcomes aligned to performance criteria at different levels of the AQF.

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\textsuperscript{12} http://ec.europa.eu/education/lifelong-learning-policy/doc/ects/key_en.pdf