Strengthening the AQF: An Architecture for Australia’s Qualifications

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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.

Further to the Australian Council for Private Education & Training (ACPET) June 2009 submission on Strengthening the AQF: A Proposal, ACPET is pleased to respond to the September 2009 AQF Consultation Paper Strengthening the AQF: An Architecture for Australia’s Qualifications.

In-Principle Support for a Revised AQF Architecture

ACPET commends the AQF Council on significant improvements made in framing a revised AQF architecture that currently features:

- A single, non-sectoral, ten level structure with attributes and criteria expressed as learning outcomes against relative dimensions of knowledge, skill and application that incorporate generic or key transferable skills
- Retention of fifteen qualifications with updated qualification type descriptors expressed as learning outcomes
- Proposed placement of integrated sets of qualification types clearly indicating a correlated positioning at:
  - Level 3 for the Senior Secondary Certificate of Education and Certificate III qualifications
  - Level 6 for the Advanced Diploma and Associate Degree qualifications, and
  - Level 8 for the Graduate Certificate and Vocational Graduate Certificate, as well as the Graduate Diploma and Vocational Graduate Diploma qualifications.

Notional Durations: Main issue requiring further consideration, consultation and clarification

ACPET expresses reservation over the present inclusion of designated ‘notional durations’ at each AQF level because this measure of the ‘volume of learning’ is poorly defined and unsubstantiated in relation to the learning outcomes focus of the revised AQF architecture and rationale.

ACPET considers narrow specification of notional durations to be the least well resolved new feature on the revised AQF, which is likely to have significant ramifications for limiting innovation and flexibility in future course design and accreditation. As such, this is a matter of concern that warrants further consideration, consultation and clarification before a revised AQF architecture promulgating notional durations could be successfully implemented. This view is reflected in findings of the AQFC report on the Strengthening of the AQF: A Proposal – Analysis of Submissions, stating that the previous round of consultation, “… resulted in the identification of some complex issues… (with) … more detail required,
including how the measure relates to the learning outcomes focus of the Proposal to enable the merits of such a measure to be fully assessed” (Page 3).

The report observes that there were, “… mixed responses to using a measure of the volume of learning to improve credit transfer arrangements” (P.13). This indicates a marked lack of consensus from a majority of respondents in support of adopting a time-based measure of learning volume unrelated to learning achievement or the context of program delivery. Instead, clear preference and comment was directed to the need for more informed deliberation on workable options for a potential AQF credit system to enable consistent, fair and reliable correlation and recognition of student achievement of learning outcomes. The report confirms that, “The overwhelming view was that the assignment of credit points should be evidence based and transparent in their calculation… (and) that a revised and more detailed volume of learning proposal is required and extensive consultations (should be) carried out to assess fully its merits” (Page 14).

The absence, in the consultation paper addressing the Architecture for Australia’s Qualifications, of a more detailed ‘volume of learning’ proposal and further research comparing the pedagogical and operational efficacy of learning outcome credit vs. duration criteria to measure learning, raises significant doubt about the relevance and indeed the viability of introducing a majority of uncontextualised notional durations onto the revised AQF, because this will most probably prove both contentious and difficult to administer from the outset.

ACPET appreciates that the intention behind inclusion of notional durations is an attempt to nominally benchmark the 10 level AQF revised qualification descriptors very broadly against national and international qualification characteristics. Furthermore ACPET understands that the term ‘notional’ may have purposefully been used to indicate that the time frames listed are not necessarily fixed. However in regulatory contexts, which operationalise the AQF to provide definitive criteria in course accreditation and quality assurance auditing, such informal or subtle caveats are likely to be disregarded in preference for enforcement of unequivocal compliance with what is interpreted as a set of rigid parameters delimiting notional durations at each AQF level of qualification.

Based on past non-self accrediting provider experience, ACPET therefore has genuine misgivings and serious operational reservations about the potential for increasing regulatory inflexibility and competitive inequity stemming from overly prescriptive interpretation of the AQF notional durations expressed in ‘years’ of learning for every qualification type on Table 2: AQF qualification type descriptors.

Of particular concern is the notion and use of the term ‘years’ in specifying notional durations for education and training. If a ‘year’ is deemed something other than 365 days constituted of 8760 hours, it represents a highly imprecise measure that becomes increasing problematic when applied to variable national and international academic contexts. It can be reasonably argued that predicating AQF notional durations on ‘years’ of learning is inherently ambiguous, rendering this addition to the AQF open to dispute over inconsistent definitions and conflicting interpretations of what exactly is meant by an academic ‘year’ under differing industry, provider, education and training circumstances.

Not all education and training provision adheres to the same standardised calendar or time frames for equivalent full-time study, designated by uniformly accepted hourly, weekly, term, semester, trimester or intensive block provision within institutional, industrial or professional delivery models or learning contexts. Historically, education and training provision has varied markedly between discipline-specific learning programs variously focused on theory, practice and application across all ten AQF levels in
different regions, industry, occupation and educational settings, inclusive or exclusive of vacation periods.

Learning time allocated, needed and taken can and does vary considerably when study is being undertaken by students and workers from different backgrounds, at different ages, on or off-the-job, participating individually or in groups in face-to-face, mixed-mode, technology mediated or by distance delivery methods. This is especially so for programs involving apprenticeship, industry or clinical placement, practicum or internship components completed within or additional to course attendance and assessment requirements. Currently, the Australian education and training system readily includes many legitimate and currently accredited public and private sector courses that are inconsistent with the suggested notional durations for revised AQF qualifications. This raises questions over the usefulness, implications and consequences of imposing overly narrow limits on the revised AQF that specific time frames for qualifications at all levels, without some clear and unequivocal overarching contingency statement that explicitly acknowledges, promotes and supports innovation, customisation, flexibility and efficiency in learning program design and delivery.

In Queensland for example, learners may leave school at age 17 and currently have up to ten years to acquit the requirements for a Senior Secondary Certificate of Education including credit available for benchmarked Certificate II – IV coursework or on-the-job training, individual university units of study or community service. Conversely a dedicated adult learner with industry experience and tutorial support can complete a Senior Secondary Certificate of Education in under a year despite having left school prior to completing Year 12. ELICOS, general education, gap training, licensing programs, technology certification, academic foundation and specific university preparation and entry courses are common pathway programs tailored for access, equity and resources to meet learning outcomes. While many of these courses are recognised as accredited AQF qualifications they do not necessary reflect common durations at any level. Therefore, the introduction of notional durations without reference to the intent, context or outcomes of the learning could impose additional unintended barrier to student entry, progress and articulation, with the added potential of compromising the relevance and competitiveness of these programs, especially in the international arena.

To improve eligibility for entry, recognition of prior learning and credit transfer into higher levels of study it is essential that different sorts and durations of preparation programs should be readily acknowledged, accommodated and accredited on academic merit at pertinent levels AQF levels according to the depth, breadth and complexity of learning outcomes. This is necessary to ensure national recognition is available for learner achievement of enabling as well as higher order knowledge, skills and applications.

Furthermore, it should not be overlooked that for almost two decades, as a matter of government policy at some AQF levels and in some industry sectors the presumption of ‘time-serving’ has been anathema to the meaningful, efficient and cost effective demonstration of achievement of learning outcomes in Australia. In this regard, progressive change in educational and industrial legislation and regulation over recent years has conscientiously sought to modernize, reduce and/or eliminate mandatory time frames. The aim has been to refocus attention onto evaluating the evidence of quality learning achieved, rather than the quantity of time involved thus discounting undue and restrictive emphasis on the duration of study to improve flexibility, encourage a shortening of maximum apprenticeship terms and facilitate new initiatives like the provision of apprenticeships in schools for example.
In Higher Education across Australia the award of a qualification is primarily based on the achievement of differing numbers of credit points, rather than being a function of a specified period of time spent enrolled in a course. In this context, what does and does not constitute the learning demands of ‘yearly’ course commitments currently differs very widely between Universities and Faculties from 10 to 15 or 18 weeks per trimester or semester. Typically, this is made up of highly variable hours per week attributed to lecture, tutorial, laboratory and independent study, research and assessment commitments on or off campus. Double degrees provide a good example of where committed students can and do regularly achieve multiple qualifications in less time than if the same qualifications were studied sequentially. This is an example of innovative course design that could prove difficult to accredit under a prescriptive regulatory reading of the revised AQF notional durations.

ACPET acknowledges that while the suggested AQF range of notional durations may seek to reflect certain generalised norms, with conditional statements at only Certificate III and Certificate IV levels, the time frames noted are not universal indicators of quality. Little provision is made under the notional duration of student learning on Table 2: AQF qualification type descriptors for programs designed to accommodate differing learner characteristics or needs; or institutional, enterprise or industry contexts, or indeed alternate modes of teaching and learning delivery at each of the ten AQF levels. In a national education and training system in Australia that is striving for improved innovation, responsiveness and flexibility of learning opportunities and teaching strategies, ACPET is concerned that the introduction of unqualified notional durations as currently specified on the revised AQF may inadvertently shift attention away from the achievement of quality learning and serve to wind back the clock to entrench outmoded and inefficient practices.

There are already some indications that regulatory imposition of nominal AQF durations is already being imposed by regulators to question course design and constrain delivery, increasing possible rejection of accreditation or re-accreditation on otherwise robust and quality assured learning programs that satisfy AQF requirements in all other respects. An increasingly prescriptive trend in this direction as a result of the proposed changes to the AQF is of particular concern for the future accreditation of customised adult learning, new technology mediated and intensive enterprise-based delivery of Tertiary Education.

Therefore to avoid misinterpretation and unforeseen regulatory consequences of introducing AQF notional durations, ACPET recommends that it will be important for the revised AQF Guidelines to:

- Satisfactorily define an academic ‘year’ in terms of a quantum “demand of learning” applicable across all AQF levels and contexts equally, with capacity for these determinations to be upheld on appeal
- Amend both the Diploma and Advanced Diploma notional durations of student learning to 1 – 2 years to reflect widespread current practice and accredited course delivery in both public and private education in VET and Higher Education
- Declare that notional durations for nested programs are cumulative, given the AQF intention that “…each level build(s) on the previous level” (P. 6)
- Explicitly provide a contingency statement outlining scope within the AQF Guidelines for justifying reasonable variation and exceptions to notional durations of student learning, with guidance on the appropriate reference or authority for arbitrating accreditation disputes
- Make clear to regulators and qualification developers that nominal durations on the AQF are indicative and not mandatory
- Give unequivocal priority to encouraging and supporting accreditation of innovative, responsive, flexible and efficient learning programs that clearly deliver achievement of AQF level learning
outcome in terms of knowledge, skills and applications, rather than over-reliance on or default to notional durations

- Address the qualitative measure of learning content in terms of scope and complexity on learning outcomes achieved in a credit recognition system that provides consistent, evidence based correlation and acknowledgement of prior learning to improve access, equity and advanced standing in AQF qualifications.

**ACPET Responses to Questions 1 – 13**

1. **How well does each levels attributes express the level?**

Table 1 provides levels attributes in a clear, concise and sequential manner. Description of the hierarchy of achievement and employment however is at time explicit and otherwise indeterminate where the level of cognitive, practical or applied occupational relevance is only implied.

To strengthen the statement of attributes and better reflect the increasing trend toward casualisation of the workforce, ACPET suggests the following amendments (noted in **bold**) to further differentiate educational and/or occupational attributes at the following levels:

**LEVEL 3:** “Knowledge and skills for further tertiary (in place of ‘higher’) education and training and/or administrative, operational or skilled trade employment”.

**LEVEL 5:** “Cooperative and/or independent application of specialised knowledge and skills for further learning and/or skilled / paraprofessional employment.

**LEVEL 6:** “Collaborative and/or independent, wide ranging, highly specialised knowledge and advanced skills for further learning, paraprofessional employment and/or group project or freelance work”.

**LEVEL 7:** “Systematic and coherent body of knowledge, principles and concepts and higher order learning skills for further learning, professional employment, self initiated project work and/or specialist contract servicing”.

**LEVEL 8:** “Broad and/or specialized skills for further learning and professional or highly skilled employment, independent practice, sole trading and/or entrepreneurship”.

**LEVEL 9:** “Mastery of a complex specialized field of learning, an area of professional practice, management, commissioned service or expert consultation”.

**LEVEL 10:** “Substantial original contribution to knowledge in a field of learning, innovative professional practice and/or collegiate or executive leadership”.

2. **How well do the levels criteria explain the relativity between levels?**

The relativity of the levels criteria, as they currently appear on Table 1 is in need of further clarification to better reflect different employment requirements and opportunities within the same level. In line with the above suggested amendments, this is particularly important at:

- **Level 3** / Certificate III to declare a ‘trade’ compared to parallel non-trade outcomes for students and employers
- **Levels 5 & 6** / Diploma, Advanced Diploma/Associate Degree to indicate expectations for work group and team participation also noting scope for freelance and project activities
- **Levels 7 & 8** / Bachelor, Graduate Certificate and Graduate Diploma to recognise a capacity for self employment and entrepreneurship based on experience and expertise.
• Levels 9 & 10 / Masters and Doctoral degrees to acknowledge managerial and leadership responsibilities and demands on academic and/or professional performance associated with this level of achievement.

3. Please provide any suggestions for refinement.

In addition to suggestions for refinement provided in answers to Questions 1 and 2 above, the following expansion of knowledge, skills and applications at levels 7 – 10 is recommended:

LEVEL 7 Knowledge: “Broad and integrated theoretical and technical knowledge of an area of learning, professional employment and/or specialist project work”.

LEVEL 7 Skills: “Cognitive and technical skills to analyse multi dimensional tasks, interpret issues and propose solutions to defined problems and communicate information and ideas in selected formats relevant to specialist and non-specialist audiences”.

LEVEL 7 Application: “Autonomy, cooperation and judgement in often complex and unpredictable contexts that require collegiate or collaborate and/or self directed work and learning within broad parameters”.

LEVEL 8 Knowledge: “In depth theoretical and technical knowledge in an area of advanced disciplinary learning and/or specialist professional work”.

LEVEL 8 Skills: “Cognitive and technical skills to investigate and interpret issues and propose solutions to defined and emerging problems and communicate information and ideas in a range of different formats for specialist and non-specialist audiences”.

LEVEL 8 Application: “Broad autonomy and judgement in challenging contexts involving the establishment and maintenance of professional relationships and information networks that require self directed work and learning within changing parameters”.

LEVEL 9 Applications: “Autonomy, responsibility, and authority as a leading practitioner, manager or scholar”.

LEVEL 10 Skills: “Exercise expert and specialised cognitive and technical skills in research and advanced practice including the design of concepts and research methodologies: the skills to lead, investigate, synthesis, evaluate and undertake independent critical reflection and skills to communicate results to peers and the community”.

LEVEL 10 Application: “Autonomy, responsibility, and authority as an expert practitioner, executive manager, advocate, theorist or scholar recognized within and/or beyond one or more professional fields”.

4. Please comment on the qualification types descriptors and provide any suggestions for refinement.

Table 2 provides ready comparison of type descriptors. Suggested refinements include:

LEVEL 1 Purpose: “Initial qualification providing basic functional knowledge and skills for further learning and work preparation. Breadth and depth with some complexity of knowledge and skills to prepare a person to perform specific, mostly routine and predictable activities”.

LEVEL 1 Application: “Application of knowledge and skills with some autonomy within specified contexts and established parameters.”
Contexts may include preparation for further learning, life opportunities and/or a variety of initial routine and predictable employment-related contexts including directed and/or supervised participation in group or team work).

LEVEL 2 Purpose: “To prepare individuals for mainly routine work and/or pursuing a pathway to further learning by taking responsibility for own decisions and performance. Breadth, depth and increasing complexity of knowledge and skills …applied”.

LEVEL 2 Knowledge: “Basic factual, technical and procedural knowledge in defined areas of learning and work”.

LEVEL 2 Skills: “A defined range of: Cognitive skills … Cognitive and communication skills to apply and communicate known solutions to a limited range of predictable problems as an individual and by constructively contributing to achievement of shared group or team outcomes. Technical skills to …options”.

LEVEL 3 Purpose: “The completion of Senior Secondary Certificate outcomes in or out of school contexts, providing a pathway for further learning, work and participation in civic life”.

LEVEL 3 Purpose: “To prepare individuals as skilled administration, service or technical operators or designated tradespersons who apply a broad range of knowledge and skills in varied work and licensing contexts and/or as a pathway to further learning. Breadth, depth and complexity of knowledge and trade competence including selecting, adapting and transferring skills and knowledge to new environments and providing technical solutions in the resolution of specific problems.

LEVEL 3 Knowledge: “Factual, technical, procedural and underpinning theoretical knowledge in a discipline-specific area of learning and work, sufficient to independently maintain up-to-date knowledge of evolving operational, technology or other workplace applications, OH&S including pertinent regulatory obligations”.

LEVEL 3 Skills: “Well developed: Cognitive … Cognitive and communication skills to accurately identify, apply and communicate known solutions to a variety of predictable problems. Technical and communication skills to provide accurate advice and reliable technical information to non-technical clients and customers. Technical skills to troubleshoot, diagnose and undertake routine and non-routine technical tasks in a defined range of skilled operations.

LEVEL 5 Skills: “Cognitive …Cognitive skills to plan …Technical and communication skills to express …Technical and communication skills to analyse, plan, design and communicate approaches to unpredictable problems and/or project coordination, contract supervision, or delegated task management requirements. Communication skills to transmit knowledge …understanding of knowledge.

5. Will more explicit types descriptors resolve concerns with AQF qualifications, for example the diversity within qualification types such as the Certificate III and the Masters degrees? 

Traditionally the difference between a Certificate III and a Masters degree is marked and therefore well understood as self evident in relation to decisions about eligibility, entry, execution and completion. Therefore it is highly unlikely that these two qualifications and the related AQF descriptors would ever be confused one with the other or misinterpreted by students, employers, program developers, providers or regulators.

The same cannot be said for the:
- Senior Secondary Certificate of Education, Certificate III non-trade and trade qualifications
- Diploma, Advanced Diploma and Associate Degree qualifications
Graduate Certificate and Vocational Graduate Certificate or Graduate Diploma and Vocational Graduate Diploma qualifications.

The revised AQF Architecture for Australian Qualifications is a significant move toward the conceptual revitalisation and operational streamlining of tertiary education in Australia linking post compulsory pathways and qualifications in schools with vocational and higher education outcomes under one ‘tertiary’ umbrella. However, while the 10 levels of the revised AQF represent an internally consistent, compatible and largely contiguous range of qualifications, some duplicated qualification types unfortunately retain and therefore perpetuate a legacy of sectoral differentiation that has diminishing relevance for future education and training provision.

ACPET argues that to attain full continuity and progression in a truly integrated Tertiary Education system that promotes and readily facilitates ease of articulation between 10 different qualification levels, the present revision of the AQF would need to go somewhat further by taking the decision to reduce the overall number of qualifications from fifteen to twelve.

ACPET recommends action to:

- Maintain Senior Secondary Certificate alignment at AQF Level 2, or more clearly articulate a general education qualification descriptor at Level 3 that requires of school leavers achievement of comparable adult learning responsibilities and outcomes to that currently expected for award of licensed trade qualification
- Recognise parity, but institute increased differentiation at AQF Level 3 between Certificate III non-trade and a separately described ‘Trade Certificate III’ qualification
- Adopt the single AQF Level 5 Diploma qualification with scope for both academic and higher order technical outcomes and applications, as is currently proposed
- Similarly, subsume the AQF Level 6 Advanced Diploma requirements into one Associate Degree at this level, again with explicit scope for both advanced academic and technical outcomes and applications
- Also, subsume the AQF Level 8 Vocational Graduate Certificate into one Graduate Certificate qualification, along with subsuming the Vocational Graduate Diploma into a single Graduate Diploma qualification, acknowledging that in the post-Bradley regime of Tertiary Education the “vocational” nomenclature is soon to be redundant, quickly to become a remnant artifact of a now superseded sectoral divide.

For the sake of AQF clarity with enhanced integrity, the streamlined reduction in the number of qualification types and titles from fifteen to twelve is logical in that it would retain the 10 AQF levels but eliminate the unnecessary and currently bewildering duplication of similar but different qualifications at the same level. The exception to this rule would be at Level 3 only, with respect to the final positioning of the Senior Secondary Certificate of Education and of the ACPET recommended ‘Trade Certificate III’.

Such a bold revision of the AQF list of qualifications at this juncture seems is both opportune and timely. It would greatly aid regulatory reform by providing an immediate and unequivocal mechanism for implementing national education policy for Tertiary Education under a unified regulatory framework.

6. It is proposed that the Senior Secondary Certificate of Education is placed at level 3. Does the qualification descriptor adequately reflect this level?
As noted above, the proposed repositioning of the Senior Secondary Certificate of Education at Level 3 is difficult to reconcile, especially in the absence of any compelling rationale or verification. The prospect of having three Level 3 equivalent qualifications presents a challenge to the internal consistency and continuity on the AQF due to an inevitable conflating of multiple school and/or industry outcomes with minimal differentiation. There is a risk of serious confusion in the minds of students, parents, careers advisors, employers and further education providers that could potentially compromise the perception and regard for Level 3 achievements with little substantive gain in recognition by institutions, workplace employers or the community at large.

ACPET considers that to justify and secure widespread public acceptance for the upgrading the Senior Secondary Certificate of Education qualification to Level 3, the AQF would need a much more explicitly differentiated general education descriptor that better incorporates adult learning requirements. Descriptive of Level 3 learning orientation, scope and outcomes for the Senior Secondary Certificate of Education would need to be commensurate with the established academic and technical outcomes currently required of non-trade and trade graduates entering industry and further education with evidence of Certificate III attributes and criteria attained.

Even with an enhanced AQF descriptor, the upgrading of the Senior Secondary Certificate of Education to Level 3 may precipitate a decline in community and industry confidence in trade qualifications. At issue is a question over learner maturity, with a potentially significant capability gap in independent thinking, specialist learning, autonomous experience and responsibility for self and others of Level 3 school leavers entering the workforce, compared to adult learners who have completed Year 12 and satisfied the requirements of a full trade qualification in industry. To warrant public support and confidence on completion of a Certificate III trade qualification, trade graduates must be able to credibly demonstrate a reasonable capability for working unsupervised in full compliance with professional indemnity and licensing requirements. By comparison, Year 12 school leavers are not currently required to meet these same demands or carry the same level of individual responsibility in the community as is demanded of qualified plumbers, carpenters, electricians, mechanics and other trades people. A real or perceived disparity makes the proposed elevation of the Senior Secondary Certificate of Education to Level 3 unconvincing and potentially unsustainable.

Similarly, in terms of cognitive development and student application to theoretical studies, there are very different academic disciplines and general education priorities for the Senior Secondary Certificate of Education preparation for further education, compared to apprenticeship training. If such different expectations were both to be situated at Level 3, this may also potentially erode student interest and commitment to the pursuit of a more intellectually challenging and academically rigorous pathway during senior school in preparation for the higher levels of Tertiary Education in the future. In this context it is difficult to see what benefit to industry or academe is thought might be derived from repositioning the Senior Secondary Certificate of Education at AQF Level 3.

Ultimately this decision could prove counterproductive by undermining community and employer confidence in both school and trade outcomes at a common Certificate III equivalent level that is perceived to have been diminished on all fronts. ACPET therefore recommends maintenance of the Senior Secondary Certificate of Education alignment at AQF Level 2 or development of a more explicitly differentiated Level 3 descriptor for general education outcome; plus recognition of parity with clear differentiation at AQF Level 3 between the Certificate III non-trade qualification and a separately described ‘Trade Certificate III’ qualification.
7. Is there a case for qualifications leading to trade outcomes to be identified as a different qualification type?

Yes, ACPET supports this option for the reasons mentioned previously.

8. Is there a case for only one kind of the Graduate Certificate and the Graduate Diploma qualification types?

Yes, ACPET supports this option. The “vocational” nomenclature is likely to quickly become anachronistic in a unified Tertiary Education system. The proposed qualification type descriptors and placement of qualification types at Level 8 that are articulated in Tables 2 and 3 respectively should be amended to describe two not four qualifications.

9. Is the notional duration of student learning a sufficient measure for each qualification type?

No, for the reasons argued in the opening statements of the ACPET response to this consultation paper. Time is not an equitable or qualitatively relevant measure of learning outcomes achieved. Volume of learning expressed as time provides no reliable, consistent or academically quality assured quantum of the depth, breadth, complexity or relevance of prior learning. Hence, time allocated in course design or time served by students, especially when vaguely expressed as ‘years’, constitutes inadequate criteria upon which to determine specific entitlements for credit transfer or arbitrate advanced standing, most especially at higher AQF levels in specialized programs. Therefore in practical terms, ACPET considers this proposition to be indefensible on student appeal and restrictive on course design and accreditation.

Rather, ACPET supports the call for further investigation and consultation on development of a coherent and robust system for allocating credit points against evidence of relevant learning outcomes achieved as the only academically sound, fair and reasonable platform for establishing pathways into and articulation between AQF levels of qualification offered within or between institutional providers.

10. Does the location of each qualification type in Table 3 reflect coherence between the qualification type and level?

Apart from the previously stated exception of the Senior Secondary Certificate of Education recommended to remain aligned with AQF Level 2 or be required to match the adult learning and community responsibilities of trade outcomes at Level 3, ACPET concurs that the location of each qualification type in Table 3 does reflect coherence between the qualification type and level, provided the following suggested amendments, as indicated in answer to Question 1, are enacted with respect to the levels attributed for:

- **LEVEL 3:** “Knowledge and skills for further **tertiary** (in place of ‘higher’) education and training and/or **administrative, operational or skilled trade** employment”.
- **LEVEL 5:** “**Cooperative and/or independent** application of specialised knowledge and skills for further learning and/or skilled / paraprofessional employment
- **LEVEL 6:** “**Collaborative and/or independent, wide ranging, highly specialised knowledge and advanced skills for further learning, paraprofessional employment and/or group project or freelance work**”. 
11. Do the descriptors for the six qualifications types listed reflect their proposed level location? Or is there a case for any of the six to be located at a different level?

As noted in answer to Question 5, ACPET considers that in a post-Bradley regime of Tertiary Education the “vocational” nomenclature will soon be redundant and therefore suggests that there is no compelling justification for retaining six separate qualifications across the proposed Levels 6 and 8 in a revised AQF. Nor is there a supportable argument for reallocating all or some of these qualifications to different locations.

Rather ACPET supports the integrity and relativity of the descriptors but urges simplification of the AQF by reducing the number of these particular qualifications from six to three by subsuming the:

- AQF Level 6 Advanced Diploma into the Associate Degree, with scope for both advanced academic and technical outcomes and applications
- AQF Level 8 Vocational Graduate Certificate into one Graduate Certificate qualification, and
- AQF Level 8 Vocational Graduate Diploma into a single Graduate Diploma qualification.

12. What mechanisms are needed to assist the consistent application of the qualification requirements in the development and accreditation processes?

The primary reference for program developers is the published AQF Guidelines amended to describe and explain the revised 2009 Architecture for Australia’s Qualifications. It will be essential that these new guidelines clearly articulate not only the new requirements, but also address those significant changes in requirements and interpretation that have been instituted in the final endorsed version of the Strengthened AQF. This guide should be available in both hard and electronic copy, free to all providers subject to compliance with the revised AQF provisions.

Particular attention in the new AQF Guidelines should be given to clear advice on the application of notional durations if these are to be included at every AQF Level. This is essential to avoid introducing barriers to progression, entrenching outmoded assumptions about time dependent programming of course content with the potential for stifling innovation and flexibility in education and training delivery especially with respect to the deployment of new technologies in teaching and learning practice.

Advance notice of the pending changes should be circulated to all stakeholders at the same time, noting a commencement date with a period of not less than twelve months to phase in changes so that course documentation already in the process of being accredited or re-accredited is not unfairly compromised. Regulators should be advised not to intentionally or unintentionally begin to impose all or
part of the draft or approved changes in advance of commencement date. Arrangements, strategies and a help line for advice on interpretation of permissible transition arrangements must be made explicit to both program developers and regulators to ensure an informed, consistent, orderly, fair and reasonable roll-over to the new requirements. This should be underpinned by a national program of professional development open to all self accrediting and registered non-self accrediting providers.

In advance of TESQA commencing operations as one national regulatory authority administering vocational and higher education regulation, a concerted effort should also be made to ensure full understanding and improved commitment to implementing new AQF requirements in self-accrediting institutions such as Universities and via delegated authority through TAFE, NEAS and the relevant Boards of Studies in each State and territory. This provision is needed to avoid a lag in full implementation and to ensure regulatory attention to AQF changes is concurrently enacted by all public, private and enterprise education and training entities.

13. Are there other considerations for adding or removing qualification types from the AQF?

Designating accrediting authorities as the sole external stakeholder empowered to research and recommend to the AQFC inclusion of a new qualification type or the removal of existing qualifications from the AQF denies all other stakeholders the opportunity to directly engage in the essential processes of AQF change, thereby inhibiting stakeholder commitment to and participation in Australian education renewal and innovation processes at a fundamental level.

Rather than restricting the proposal of AQF changes to accrediting authorities alone, ACPET recommends that the AQF Council consider instituting a quality improvement cycle, with a declared period for interim evaluation and establish transparent internal processes for AQF quality assurance and review. This could ensure direct and unmediated input to the deliberations of the AQF Council are sought and received from all interested stakeholders equally with recommendations for the addition or removal of qualifications opened impartially to the broader constituency every five or ten years for example.

In a period of unprecedented change in national and international education strategies and priorities, it is important that the content and structure of the AQF retains the full confidence of all stakeholders and remains dynamic and responsive to the needs and aspirations of all participants and contributors to ensue the vitality, strength and relevance of education and training in Australia now and into the future.

Conclusion

ACPET thanks the AQF Council for the opportunity to comment on the September 2009 Consultation Paper Strengthening of the AQF: An Architecture of Australia’s Qualifications. ACPET looks forward to ongoing involvement in assisting with the national distribution of information and professional development services on approved changes made to the AQF in support of timely implementation.
Contact Details

Mr Ben Vivekanandan  
Manager, Policy and Research  
Tel: 03 9412 5912  
E: ben.vivekanandan@acpet.edu.au