



# Reshaping the Australian Qualifications Framework: the IRU approach

## Overview

The challenge for the Review of the Australian Qualification framework (AQF) is to address the tension inherent in a tool that is intended to be both informative and enforced. An effective AQF responds to reality, developing in constructive response to changes in delivery purpose and style.

The focus for the AQF has become enforcement. It now needs to switch back to being an effective description of tertiary education in Australia for the coming decade that supports not inhibits change.

It needs to embrace the breadth of current activity, incorporating new developments such as the desire to credential small elements of learning. It needs to show the range of options available to inform students, employers and other interested parties. It needs to convey clarity about the system in Australia and around the world.

This requires the AQF to be reshaped, to include that breadth and then define in sufficient detail the nature of the major qualifications and their relationships to each other.

The AQF predates the creation of the regulatory agencies – the Tertiary Education and Quality Standards Agency (TEQSA) and the Australian Skills Quality Authority (ASQA). This requires the relationship of the AQF to providers to the regulatory agencies to be clear, with the AQF reshaped to reflect its role to and guide and support, rather than determine.

## IRU Response

The IRU response first addresses the key question of what Australia needs from a reshaped AQF. The second section addresses the issues for change of the Discussion Paper.

1. The need to reshape the presentation of the AQF to acknowledge all forms of tertiary educational delivery, addressing the various forms of shorter courses and the array of options to access tertiary education and training.
2. Being explicit about 'enterprise and social skills' without imposing these as an element in every qualification.
3. The potential to simplify the framework's levels and taxonomy to be a better description of the realities of delivery.
4. The ways to ensure effective transfer from one qualification to another, ensuring a person gains the expected skills and knowledge without undue repetition of study.
5. Expressing the link between senior secondary certificates and other school qualifications to the tertiary system the AQF describes.

6. Removing AQF supporting policies that are better covered through the standards and regulatory agencies' operating documents and defining the areas that require specific direction to providers.

The IRU response focuses at the implications of the AQF for the shape overall of tertiary education and the specifics of its impact on higher education. It does not address the relationship of the AQF to VET delivery other than to assume that a well-functioning VET system should have the same relationships with the framework that higher education does.

## IRU positions

1. An effective AQF for the future should provide a coherent context for the breadth of tertiary education and training – whereby the relationship of all activity to other education options is clear – and only then should worry at the correct application of its formal statements.

This should let the educators develop tertiary education to meet future needs and take advantage of future opportunities.

2. The legal relationship of the AQF, the HE and VET standards and the powers of TEQSA and ASQA need to be reset to achieve this outcome.
3. The AQF should
  - cover the full suite of tertiary delivery in its broad descriptive aspects
  - Include as specific additional qualification types those short courses capable of being so presented.
4. Each provider should determine whether and how to include enterprise and social skills in each of their qualifications.

A reshaped AQF should identify the suite of potential enterprise and social skills relevant for that qualifications across the framework without specifying that qualifications at a level must enhance them.

5. The AQF levels should reflect significant stages in acquisition of learning and skills with multiple qualifications possible within each.

Areas to target for improvement are:

- the need for level 8, with those qualifications aligned to current level 7 and level 9;
  - the need for a Diploma qualification at level 7 and means to recognise partial completion of a bachelor degree;
  - the need for two levels at the current level 5 and 6, with consideration of the best placement of the Associate Degree.
6. The AQF Qualifications Pathways policy should be retained and continue to define expected levels of credit.

IRU members do not support creation of a credit points system based on notional hours of delivery.

The question of how to define consistently the amount of study for purposes of establishing credit needs further exploration. Extension of funded higher education's use of EFTSL markers for each unit may be a possible approach.

7. It is sensible to include the senior secondary certificates in the AQF to show the relationships between the school system, with its various exit points and broad range of student achievement, and the tertiary qualifications.
8. The set of AQF policies should be reduced to remove the expectation for a qualifications register and otherwise tested to avoid unneeded overlap with the Standards for both sectors and the operating documents of both regulatory agencies.
9. The future arrangements for update and renewal of the AQF should be addressed in the Review's response to its terms of reference point 5 to advise on future governance arrangements.

## How well does the AQF work to deliver its objectives?

### **The multiple roles of the AQF**

The AQF describes the senior secondary certificates and the suite of post school education qualifications to show the purpose of each and their relationship to each other.

- It is a guide for students, employers and other interested parties to the formal qualifications that VET and higher education providers issue.
- Higher education providers use it as a check when designing and reviewing qualifications.
- TEQSA uses it to accredit qualifications and test the accrediting processes of universities and other self-accrediting providers.

Over its two major iterations the AQF has generally had a positive impact. It has given a greater sense of cohesion to VET and Higher Education but has been less effective in supporting an over arching sense of the tertiary education system. It has forced providers to be clear about the intent of each qualification. Equally the major higher education qualifications – the bachelor degree, the new set of professional masters and the research doctorate – rightly remain university creations developing as education needs, with the AQF adjusting to them.

Over time the emphasis has moved from describing a credible structure that reflects the actual delivery of good VET and higher education to enforcement to ensure that the delivery reflects the framework. The result is to lose focus on developing educational value from tertiary education in the desire to ensure consistency and avoid bad practice.

The Discussion Paper focusses strongly at showing differences between delivery and the AQF descriptors. Its emphasis is to resolve differences through amending the courses delivered rather than the threshold question of whether the delivery makes educational sense. If there is educational sense it should be the framework that is improved, not the qualification undermined.

An effective AQF responds to reality, developing in constructive response to changes in delivery purpose and style.

The challenge of enforcement is to remember that it is the providers of education who shape what it is and how it is delivered in response to demand for educated and skilled people. Today's standard was yesterday's innovation – if today's innovations are inhibited tomorrow's standard delivery will be the lesser.

### **The AQF and the regulators**

The Australian Qualifications Framework pre-dates the creation of the two tertiary sector Quality regulators (TEQSA and ASQA) and the creation of the higher education standards framework. An important outcome from the Review should be to adjust the nature of the AQF to be a support tool for the quality agencies, not a rigid structure.

This would require the Agencies to exercise good judgement about how it is enforced, that supports constructive development of qualifications and gives providers the basis to argue the value of their activities where they develop education outcomes ahead of the AQF. The future approach to registration that emerges from the [Review of Provider Categories](#) should provide a basis for the Agencies to grant greater, or lesser, levels of discretion to providers.

### **The gaps in the AQF**

The Discussion Paper, through its focus on new and old forms of delivery not covered by the AQF, highlights the AQF's lack of adaptability to how tertiary education is or should be developing. It reinforces concerns that the AQF is not now well suited to future needs.

- The AQF's current structure of levels and approved qualifications does not address the growing array of non AQF activity and the incentives to direct effort outside of the AQF. If an initial driver for the AQF was to ensure little to no activity was not subject to it, the current weakness is that it does not incorporate the new. This is to the detriment of both established qualifications and to the potentially new.
- The tertiary debate and aspects about the relationship of the two sectors suggests the qualifications as defined do not capture well the shape of the tertiary system.
- There remains ongoing concern about how well individuals understand what qualifications or skill sets they can or should acquire.
- The endless concern for credit transfer and recognition of prior learning remains divorced from an effective sense of where additional education adds, completes or by contrast develops significant new areas of knowledge and skill.

The AQF's focus should revert to being an effective descriptive tool that also serves to underpin regulatory activity to accredit qualifications and ensure appropriate activity.

### **IRU position**

1. An effective AQF for the future should provide a coherent context for the breadth of tertiary education and training – whereby the relationship of all activity to other education options is clear – and only then should worry at the correct application of its formal statements.

This should let the educators develop tertiary education to meet future needs and take advantage of future opportunities.

2. The legal relationship of the AQF, the HE and VET standards and the powers of TEQSA and ASQA need to be reset to achieve this outcome.

## The issues from the discussion paper

### 1. Extending coverage to 'shorter form credentials'

The review paper argues the need to include short form credentials within the ambit of the AQF. The case is strong. There is significant activity and growth.

Allowing major education offerings outside the AQF reduces its value and could have negative impact on delivery both within and without the AQF. Delivery outside the AQF has less public certainty about its intent and use, and carries a greater risk of unsuitable provision through being beyond the scope of regulation. Those operating within the AQF can be comparatively restricted in what they are permitted to do, encouraging a mix of conservatism and efforts to position delivery outside of the AQF.

The challenge is to incorporate this activity in a way that provides a clear context for those other courses without overwhelming operations of providers or regulators. The AQF should be reshaped to include a broader general section that acknowledges all forms of legitimate delivery and makes clear which are covered in the specific qualification types the AQF defines and why. Rather than a sharp divide of non AQF and AQF we would have a spectrum of delivery.

The paper uses language of 'qualification type' for the current suite of titles and 'credential type' for those not now included. The language is confusing. The credential types cited in the support paper cover:

- potential qualifications (enabling courses, micro credentials, professional qualifications),
- the means of delivery (MOOC; short course), and
- explicit bits of a qualification (skill sets, incomplete qualifications).

#### **Potential new qualifications**

The question for each of these possible inclusions is whether the outputs lend themselves to being a qualification, in which case they can be aligned to the levels of the Framework. The Review team proposed this during the first consultations through the creation of a notional 'short course' at each level.

- This would apply to most of what is now called a 'micro-credential'.
- It should apply to more substantial offerings like a professional body's awards.
- The university enabling course could be aligned to a level and given a clear element of transferability that would assist any move to concentrate its delivery into fewer universities.

There would need to be agreement on nomenclature, which would likely need to breach the current assumption that a single title is restricted to particular qualification at one level. However, this is effectively the case now through the certificates 1 to 4 which use a common title 'certificate' spread over four levels to reflect increasingly more complex outcomes. The emphasis would move towards notional level plus the title of the qualification.

One major policy and practical test is whether TEQSA can afford to accredit each short course from a non-self-accrediting provider. The potential array is enormous, creating a practical barrier for TEQSA,

while it would impose it into the detailed operations of each non-self-accrediting provider to an extent that is not justified.

There is a level of competence that any provider should have before it can be registered. If through incorporating the full scope of formal tertiary education into the AQF it raises the expectations for being a provider that is a necessary consequence. Providers should not rely on TEQSA to do their development work but be able to justify that all that they do is suitable.

Instead, there needs to be an effective scrutiny of the provider through the registration and regular monitoring processes that determines when a provider can approve micro courses and for some excluding them from such opportunities until they are capable of creating and supporting them.

### **Parts of a qualification**

Each university unit at bachelor level is a level 7 element. Completion of them is well recognised for the purposes of entry to a bachelor course based on previous incomplete HE degree.

If learning from currently non-AQF driven provision is tied to a level it would create understanding of the level of learning claimed and assist bundling the lumps into a qualification. This ought not to be mean that every company training certificate is caught up but that all offerings with a public focus, those available to any who are interested, should be. There are also important questions to ensure the qualification as a whole has coherence.

The lack of an exit point for part way through a bachelor degree has long been commented on. The capacity to imbed the current level 5 and 6 qualifications as is done with the level 8 qualifications leading to a Masters has faltered for various reasons, one of which is the formal ascription of a level lower than the bachelor 7 to completion of significant stages of it. Potential ways to resolve this are considered in section 3 below.

### **Recognising the means of delivery**

A qualification is a defined set of learning that is linked to a level of the AQF, with certification that the learning was achieved and the expectation that the learning will be recognised broadly by employers, other education providers and licencing bodies.

Some forms of activity may not support this, or the effort of allocating a level and monitoring it for consistency would be more effort than of value. These are better acknowledged as education opportunities that have value but not otherwise tied deeply into the framework. For example a MOOC enrolment could well meet none or only some of these tests. If that is clear to the person enrolled there should need be no further scrutiny.

### **IRU position**

3. The AQF should
  - cover the full suite of tertiary delivery in its broad descriptive aspects
  - Include as specific additional qualification types those short courses capable of being so presented.

## 2. Enterprise and social skills

The Review paper argues that enterprise and social skills are not well articulated as qualification outcomes, both in specific qualifications and in the AQF descriptors of the qualification type. The emphasis of the paper is that these skills need to be defined for each qualification type and appear as an element in each qualification of that type.

However, the paper accepts the argument that these skills are highly context dependent (problem solving in a classroom distinct from it on an oil rig), which seems to constrain how usefully they could be included.

The current AQF does not specify the various sets of skills and knowledge that a qualification will provide, recognising that these vary considerably by the context of the qualification, particular the area of knowledge. To provide context it does set out what some of these skills are. To the extent that enterprise and social skills are not sufficiently covered then the support sets of information should be extended to cover them more extensively.

The actual design of a given qualification should remain the responsibility of the qualification developers who will include enterprise and social skills as they think relevant. The pressure to ensure graduates are prepared for a work place is strong. It has been the focus of IRU members among other universities for some time. However, this does not mean every single qualification must resonate with all skill areas. Qualifications that do, and those which do not, include enterprise and social skills will be judged by the decision of students to choose them or not.

### IRU position

4. Each provider should determine whether and how to include enterprise and social skills in each of their qualifications.

A reshaped AQF should identify the suite of potential enterprise and social skills relevant for that qualifications across the framework without specifying that qualifications at a level must enhance them.

## 3. The structure of the AQF: taxonomy, levels and volume

Few people can read the AQF level and qualification descriptors to generate a sense of a qualification from them. They are read with current qualifications in mind to test that a qualification to be developed or accredited aligns sufficiently to be approved.

The focus ought always to remain on how well the AQF describes the reality of what needs to be delivered, not the reverse.

The Discussion Paper makes no proposals for change but asks for input on opportunities and need for change. Issues to be considered include:

- the relationship of levels and qualifications;
- the variation in the extent of learning and skills allocated to a level; and
- potential to reduce the number of levels.

### **Levels and qualifications**

The argument for AQF revision in the mid 2000s was to place the set of qualifications explicitly on a levels schema and to permit multiple qualifications at a given level. Despite that aim, only 2 of the ten levels feature more than one qualification. The presentation of the AQF emphasises the qualifications with the levels much less prominent.

That was likely a pragmatic outcome to deal with the then existing set of qualifications. Combined with the difficulty of adding a qualification it has ensured that there has only been one notable change, with the inclusion of profession based masters that give the title doctor to the holder of the qualification.

As the Discussion Paper also makes clear, the assumption of a hierarchy of difficulty or complexity on every factor at each level struggles to account with sector differences between VET and HE, leading to an outcome that tends to diminish VET rather than highlight it.

The discussion of the inclusion of short courses at each level embraces the potential for the AQF to have more qualifications at a level, distinguished by differing amounts of learning involved or the purpose of the qualification (compare an enabling qualification that intends to set up entry to a bachelor degree with a diploma that has a formal outcome of its own).

The reshaped AQF should embrace the potential of the levels framework to include currently excluded delivery at the relevant level with a clear qualification's name.

### **What does it take to be a level: the extent of learning acquired**

The extent of learning attributed to each level varies considerably across the ten. Level 7 covers the learning from a bachelor degree, from its initial stages to its completion; level 10 covers the increase in research skills from the beginning of a PhD to the end. Both require three or more years to complete. An apprenticeship is similar, whether allocated to level 3 or 4. The other levels feature qualifications that are much more limited in the difference in learning and skills from beginning to end of the qualification, with little scope for new qualification types without broaching into the levels above or below.

This may not matter but it suggests considerable scope for fewer levels with multiple qualifications in each.

### **Options to simplify the levels covering higher education**

From a higher education perspective the dominant qualifications of a bachelor degree and a PhD drive two distinct levels, with the coursework masters a third. It is not clear that the distinction intended by having level 8 for graduate certificates, graduate diplomas and bachelor degree honour programs is real.

Stronger use of level identifiers would reduce the past dilemma of some graduate certificates and diplomas, notionally level 8, being units from bachelor degrees (level 7) and others being material that build on that which a bachelor degree provides. Both are legitimate opportunities.

HE diplomas which are a subset of a degree, notably in languages, do not fit the current AQF. There should be a clear accepted way for these to be recognised for what they are. Building on the previous discussion a Diploma Level 7 may be the simple answer.

There is similar argument to test the current level 5 and 6 qualifications for the need for two levels rather than one with multiple qualifications and whether an associate degree is better placed at the current level 7.

### **Reflecting the two sectors**

The mix of sectors at levels 5 and 6 highlights the Discussion Paper concern that there is no simple hierarchy of complexity across all skill and knowledge areas. The mixing intensified the problem of simply seeing VET qualifications as lower level than higher education qualifications, understating the skills involved for the VET qualifications. This is clearly seen in the contrasting use of the level 5 and 6 qualifications as

- markers of higher level skills in VET for those with particular aptitude, and
- lower level higher education qualifications, particularly suited to people whose academic skills and interests need further support before enrolling in a bachelor program.

The responses to the differing financial incentives across the two sectors has led to shifts of focus on which sector to ascribe to a qualification driven by funding ends rather than educational, a process that undermines any sense of cohesion.

The reshaped AQF needs a way to recognise well the skills of the advanced VET qualifications distinct from initial higher education study.

### **IRU position**

5. The AQF levels should reflect significant stages in acquisition of learning and skills with multiple qualifications possible within each.

Areas to target for improvement are:

- the need for level 8, with those qualifications aligned to current level 7 and level 9;
- the need for a Diploma qualification at level 7 and means to recognise partial completion of a bachelor degree;
- the need for two levels at the current level 5 and 6, with consideration of the best placement of the Associate Degree.

## **4. Supporting pathways and the metric of portable learning**

A long standing objective of Governments has been to make the route from one qualification to another easier to navigate, with minimal repetition of learning. The focus is entry to the bachelor degree for people with higher level VET qualifications and those with level 5 and 6 higher education qualifications.

The transitions at post bachelor level and across VET seem less fraught.

The description of the qualification types addresses how each relates to others, with the relationships reasonably well understood. The Qualifications Pathways Policy enshrines this, most notably in defining desired levels of credit for previous study. Universities all recognise the need for credit and apply it for students. The process is not always simple.

General credit (reduced number of units needed to complete the degree) works best where there is a strong alignment of subject matter or the receiving qualification is suited to omission of a portion of it without notable loss to the overall outcome.

Specific credit unit by unit based on a close alignment of previous to prospective areas of learning requires analysis person by person which can be time consuming and appears disorganised and not easily consistent.

Both presume the student wants to minimise the amount of learning to acquire the degree, which may often be true but is far from always so. The credit should not so much that it inhibits the student's learning by assuming confidence with previous learning that would be improved through some repetition. This risks are higher for students moving across the sectors where the different learning styles can undermine apparent points of overlap.

Overall, the current AQF policy sets the objective. The qualification descriptors should continue to identify the fit with previous and follow on qualifications.

The Discussion Paper proposes to regularise the portage of previous study by defining each in common terms. This relates both to current arrangements for transfer from one qualification to another and to the impact of many more people taking short credentials and sets of learning. If these are to be the basis for bundling into other qualifications or credit against them, a common measure could be of value.

Introduction of a mandatory credit point system would be costly and timely to implement. It is unlikely that there would be sufficient benefits across all providers to justify the costs of implementation. The meaning of an hour is challenging, with severe risks of too literal an interpretation and the opposite of fanciful levels ascribed to a piece of study.

In contrast, a recommended alignment between credit points and volume would be helpful to assist students seeking credit transfer and portability between institutions within Australia and overseas. One option that makes sense in the higher education qualifications is to use the funding measure of EFTSL which is applied to all student load in funded institutions and which could be applied by other providers. Whether it would work for VET qualifications is a different question – although it should not be harder than establishing credit points.

The proposal for a register of pathways is highly implausible. Potential students should have the confidence to expect ways to move from one qualification to another and be able to find suitable information about this from the providers. Any national presentation of that information would falter against the number of arrangements to recognise and the necessary caveats about many.

## **IRU position**

6. The AQF Qualifications Pathways policy should be retained and continue to define expected levels of credit.

IRU members do not support creation of a credit points system based on notional hours of delivery.

The question of how to define consistently the amount of study for purposes of establishing credit needs further exploration. Extension of funded higher education's use of EFTSL markers for each unit may be a possible approach.

## 5. Senior secondary school certificates

The AQF appears to have limited impact on school education.

Including the year 12 school qualifications in the AQF recognises that they are the major staging point into tertiary education. The reality of the school curriculum and the outcomes achieved are driven by processes independent of the AQF. It is that knowledge and level of achievement that matters most for subsequent education. However, the tertiary system must work with all Australian following their schooling including those who did not complete a year 12 certificate and those who completed no school level qualification.

The Discussion paper points out that school certificate holders cover a broad range of demonstrated learning, since the certificates are intended to cover 100% of the cohort (even if only 70-80% achieve it). This achievement appears to range across several of the AQF levels showing that the levels remain highly context dependent in forms of VET and Higher Education, rather than being objective absolute statements of learning.

The Discussion Paper suggests making more explicit how the senior secondary certificates provide the basis for tertiary qualifications.

### **IRU position**

7. It is sensible to include the senior secondary certificates in the AQF to show the relationships between the school system, with its various exit points and broad range of student achievement, and the tertiary qualifications.

## 6. AQF policies

The AQF predates the creation of the two national regulators. It required deterministic policies to support a system of linked State based regulators implement registration and monitoring of VET and higher education providers to a high level of consistency.

The creation of TEQSA and ASQA which operate nationally allows a clearer outcomes focused set of policies where needed in addition to the standards set down for each sector.

### **Qualifications Issuance**

The Higher Education Standards set out requirement for the issuing of qualifications framed in the standards style against the outcomes desired. The qualifications issuance policy provides the more detailed set of requirements that are important to the ensuring qualifications once issued are well understood and that there is a low risk of misuse.

### **Qualifications Pathways**

The argument to retain the Qualifications Pathway policy as the national guide to desired outcomes makes sense. The specific nature of the policy, notably the key clause 2.1.10 that sets out the notional starting point of credit, is not consistent with the style of the HE Standards.

The proposal to create a register of pathways is implausible.

### **Qualifications Register**

The register has not been created but the function is covered by TEQSA and ASQA.

### **Qualification Addition and Removal**

The Discussion Paper argues the case to retain a policy for how qualifications are added and removed from the AQF. The challenge is to ensure that the AQF can be dynamic enough to respond to developments over the coming decade, and not require a major review to incorporate developments consistent with the reshaped AQF.

How well the AQF can change more regularly should be a test of proposals from the Review.

The Review report, consistent with its Terms of Reference point 5, should

- address the question of which bodies are responsible for monitoring the ongoing suitability of the AQF, proposing updates that do not require a major review, and
- otherwise outline how the AQF which sits across two levels of Government, two sectors of providers, and two regulatory bodies should be governed.

### **IRU position**

8. The set of AQF policies should be reduced to remove the expectation for a qualifications register and otherwise tested to avoid unneeded overlap with the Standards for both sectors and the operating documents of both regulatory agencies.
9. The future arrangements for update and renewal of the AQF should be addressed in the Review's response to its terms of reference point 5 to advise on future governance arrangements.

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