

Contextual Research for the Australian Qualifications Framework Review

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Final Report

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GLOSSARY

ABS	Australian Bureau of Statistics
ACCI	Australian Chamber of Commerce and Industry
ACSF	Australian Core Skills Framework
AIG	The Australian Industry Group
ASCED	Australian Standard Classification of Education
ASQA	Australian Skills Qualifications Authority
ANZSCO	Australian and New Zealand Standard Classification of Occupations
AQF	Australian Qualifications Framework
AVETMISS	Australian Vocational Education and Training Management Information Statistical Standard
COAG	Council of Australian Governments
CSP	Commonwealth Supported Places
CQFW	Credit and Qualifications Framework for Wales
ECTS	European Credit Transfer System
ELICOS	English Language Intensive Courses for Overseas Students
ESOS	Education Services for Overseas Students
EQF	European Qualifications framework
EU	European Union
FOE	Field of Education
GLH	Guided Learning Hours
HEP	Higher Education Provider
ICT	Information & Communications technology
ISCED	International Standard Classification of Education

LOE	Level of education
MQF	Malaysian Qualifications Framework
MYH	Swedish National Agency for Higher Vocational Education
NCVER	National Council for Vocational Education Research
NEAS	National English Language Accreditation Scheme
NKR	Norwegian Qualifications Framework for Lifelong Learning
NLQF	Dutch Qualifications framework
NQF	National Qualifications framework
NSQF	Indian National Skills Qualifications Framework
NZQA	New Zealand Qualifications Authority
NZQF	New Zealand Qualifications Framework
NVQCS	China's National Qualifications Framework
QALL	Quality Assured Lifelong Learning
QQI	Quality and Qualifications Ireland
RPL	Recognition of Prior Learning
RQF	Regional Qualifications Framework
RQF	England & Northern Ireland Regulated Qualifications Framework
RTO	Registered Training Organisation
SCQF	Scottish Credit and Qualifications Framework
SCQFP	Scottish Credit and Qualification Framework Partnership
SeQF	Swedish National Qualifications Framework
SSCE	Senior Secondary Certificate of Education
TDA	TAFE Directors Australia
TEQSA	Tertiary Education Quality and Standards Agency
TQT	Total Qualification Time

TVET Technical and Vocational Education and Training
VOL Volume of Learning

1 EXECUTIVE SUMMARY AND ISSUES FOR DRAFT TERMS OF REFERENCE FOR AUSTRALIAN QUALIFICATIONS FRAMEWORK REVIEW

1.1 PURPOSE AND STRUCTURE OF THE REPORT

1.1.1 Purpose

This report describes the process and findings of the contextual research for the Australian Qualifications Framework (AQF).

The purpose of this research is to provide contextual information to inform the 2018 Review of the AQF. It comprised:

- A comparison of the AQF against a selection of national qualifications frameworks from other countries
- A consultation process and desk review of relevant documents and databases to research the breadth of the use of the AQF in both educational and non-educational settings in Australia.

1.1.2 Structure of this Report

The Executive Summary provides an overview of the main issues that stakeholders are asking to have addressed in the formal review and sets out issues for draft Terms of Reference for the review.

Chapter 2 and Appendix 4 summarise national qualifications frameworks in Europe, South Africa, Asia, the Middle East, the Pacific including New Zealand, Canada and Mexico (the USA has no national qualifications framework). The AQF is compared on the basis of a number of key parameters with common international practice.

Chapter 3 and Appendices 1, 2 and 3 discuss the current uses of the AQF in educational and non-educational contexts in Australia and summarises the implications of these uses for any changes to the AQF.

Chapter 4 summarises the feedback we received from stakeholders on broader general issues relating to their experience with the AQF. These issues include the purpose, scope, structure, and benefits of the AQF.

Chapter 5 summarises the feedback received from stakeholders relating to detailed aspects of the AQF levels, their descriptors and their relationship with qualifications. These issues are organised according to the levels of the AQF (pre-tertiary and 1 to 10).

1.2 PRINCIPAL FINDINGS

At the outset it is important to note that virtually all of the substantive comments made in submissions to the 2009 – 2011 AQF review are still at the forefront of respondents' concerns in 2018. These comments are summarised in Chapter 4.1. The 2013 revised draft of the AQF, while addressing some concerns, does not appear to have dealt with the major issues that continue to create problems in interpretation and implementation of the AQF. Further issues were also identified in the light of developments since 2012. Prominent among these more recent developments is the widespread trend towards micro-credentials, flexible delivery options and mechanisms to assist learners to construct their own programs, sometimes across sectors, to meet individual learning needs.

- 1.2.1 The AQF is very widely used across the Australian tertiary sectors and is *generally accepted as a useful instrument* with both national and international benefits. Refer to Chapter 4.
- 1.2.2 The *AQF is embedded* in a broad range of legislation, policies, regulations and processes at government level, in statistical and data collections, in some industrial agreements, in the processes of quality assurance and accreditation by registration agencies and professional bodies as well as in the policies and processes of educational institutions that provide vocational and higher education. Refer to Chapters 3 and 4 and Appendices 1, 2 and 3.
- 1.2.3 The AQF is also impacted by and impacts upon related policy areas such as workforce planning, skills development and migration policy and *cannot be viewed as a stand-alone educational instrument*. Other reviews, concurrent with this one, such as the Training Package Reform consultation (Department of Education and Training), proposed review of the ANZSCO occupations database (ABS), design of a new employment services model for 2020 (Department of Jobs and Small Business), and the visa reform agenda (Department of Home Affairs) will have significant implications for the AQF.
- 1.2.4 It is evident from the submissions by both regulators, ASQA and TEQSA, *that there are issues related to implementation of the AQF by both regulators and providers that require attention*. Among other things, these issues include ambiguity in terminology, inconsistencies in qualifications descriptors, levels criteria and volume of learning. The same issues are raised in one form or another by many other respondents to the consultation process and are outlined in this executive summary.
- 1.2.5 In the 1990s and early 2000s, Australia was a global leader in the development of qualifications frameworks. However, other countries, particularly in Europe, have moved beyond the concept of qualifications frameworks principally as a tool to establish transparency and equivalence of qualifications, *towards qualifications frameworks as a tool to facilitate an agile workforce suited to rapid technological, industrial and social change*. This evolution in emphasis is

in its early stages and reflected more at policy level than implementation, nevertheless it is widespread in its stated intent. Refer to Chapter 2, section 2.2.5 for the variety of policy objectives that are stated in recently revised international frameworks.

- 1.2.6 Prominent within the changing policy context for qualifications frameworks is a desire to design them to allow and encourage more flexible construction of learning pathways. Flexible and multi-directional pathways rather than simple hierarchical ones (as the AQF is perceived to be) are regarded as better suited to lifelong learning and rapid retraining to meet new technological challenges. *Internationally, qualifications frameworks are being designed with a view to encouraging cross-sectoral collaboration and the engagement of employers and businesses in both designing and delivering 'on-time' and 'in place' learning experiences that can be recognised formally as part of a qualification.* While the AQF allows this possibility, the complexity of the regulatory and sectoral contexts within which it sits is perceived by many stakeholders to impede this level of responsiveness.
- 1.2.7 *Australia differs from many European countries that have higher levels of employer engagement in the accreditation of education and training opportunities, especially at sub-qualification level.* There has been a reduction in traditional apprenticeship programs and the struggle for “work placement” is an increasing problem for professional training in universities. The possibility for accreditation of in-house learning or on the job training in employment and non-educational settings is left in the hands of a virtually unregulated system of individual institutional assessments and recognition of prior learning (RPL) arrangements.
- 1.2.8 While RPL and workplace learning are encouraged by the AQF *there are no mechanisms within the Australian system to assign levels to 'non-standard' learning options, or to regulate or quality assure credit towards formal qualifications for in-service or informal learning or micro-credentials in a way that ensures national or international consistency.* The need for these sorts of practices is growing in Australia. For example, in some sectors, particularly information technology, students are compiling a number of short courses and skill sets together into a package that meets industry needs. The AQF does not readily facilitate/accommodate this. The potential use of block-chains to access and verify this type of qualification is also the subject of considerable discussion. Some other countries maintain registries of individual learning units offered by reputable but non-regulated providers that have been accredited at specified levels for specified credit. See Chapter 2, section 2.4, 2.6.1.
- 1.2.9 A considerable proportion of the framework consists of policies which detail the responsibility of qualification developers, accrediting authorities and issuing organisations. *With the establishment of the legislative base underpinning TEQSA and ASQA it would be less confusing for international and lay audiences if this regulatory detail were removed from the Qualifications Framework per se and*

added to the TEQSA/ASQA conditions for registration of providers and accreditation of courses. Providers point out that the processes for meeting and demonstrating AQF compliance are largely dictated by TEQSA and ASQA at the moment. Very few international qualifications frameworks have supporting policy documents packaged as part of the framework as does the AQF. In some countries, the Agency responsible for maintaining and administering the qualifications framework is also the qualifications and/or quality assurance agency, in others the framework is simply an information and support tool and has no regulatory role. Most take the approach of briefly describing the policy areas in the framework document while referring for details to the website of the responsible agency. A submission to the contextual research by TEQSA highlights a considerable number of issues relating to the legal status of the AQF and its associated policies which should be addressed in the review.

- 1.2.10 While the overall value of the AQF is well recognised in Australia *difficulties in its design, expression and the conceptualisation of the levels have been identified by all sectors and with enough consistency to warrant their inclusion in the terms of reference for the formal review.* The substantive issues related to the levels and descriptors raised by stakeholders are addressed in Chapter 5, which could be used as a reference point for the review. Widespread concern over difficulties in interpreting and implementing levels 5, 6 and 8 in particular is expressed in the responses to the consultation, although levels 1 to 3 and 9 to 10 also present problems and anomalies. See Chapter 5.
- 1.2.11 The AQF relies heavily on notional volumes of learning expressed in years of study which is out of step with modern international practice. Movement towards a system based on credit point values related to notional average hours required to achieve learning outcomes would be in keeping with international practice and would have the added advantage of facilitating a common currency for a national credit transfer system to support pathways and recognition of non-formal learning. *The problem with volume of learning is, however, more complex and has created significant difficulties with the implementation of the AQF at most levels.* See Chapter 4, section 4.2.8.
- 1.2.12 *The AQF in its current form is exceedingly complex and rich in semantic detail. It is not easily understood by the average reader or by international audiences or the wider community* who are unfamiliar with the history of its development. In its printed form the AQF is four times longer than the New Zealand Qualifications Framework. Some users report confusion over terminology, ‘technical lingo’ and question the need for or relationship between both levels criteria and qualification descriptors. See Chapter 4.
- 1.2.13 Qualifications Frameworks in many European countries are viewed as a *valuable resource for the general public and employers in informing their educational and employment choices.* Consequently, explicit emphasis is placed on the governance and promotion of frameworks and on raising awareness of their

utility as guides to personal decision making and workforce training and planning. *Neither the governance framework nor the physical expression of the current AQF facilitates its use as a communication tool for the wider audience beyond course designers and regulators.*

1.2.14 Consistent with the ongoing evolution of national qualifications frameworks the *AQF review should consider the need for a governance framework that will provide the ability to monitor and respond to changing needs and policy objectives and to clarify and simplify its position within the education and qualifications landscape.* The consultations for this contextual research revealed that *there is considerable lack of clarity both nationally and internationally about the standing and purpose of the AQF within the relatively complex Australian landscape* of jurisdictional/federal, general/foundational, school, vocational, higher, postgraduate, professional and continuing education. Most international qualifications frameworks are administered by statutory authorities appointed by governments or by branches of ministries and government education agencies. It is common for these authorities to also have steering or advisory committees consisting of stakeholders. The Frameworks are surrounded by or incorporated within a relatively predictable web of regional frameworks, industry advisory bodies, qualifications agencies, quality assurance agencies and education providers who in some countries are given significant autonomy. Refer Chapter 2.

1.2.15 Reinforcing the need for a responsive governance structure for the AQF is a comment provided by one senior university executive:

The AQF functions as a public sector instrument concerned with compliance, standardisation and predictability. 'future proofing' is premised on a notion of the AQF as a kind of fixed point. The tertiary sector environment is anything but fixed, with many of the changes coming from the public sector [policy]. Other significant changes include increased demand for micro and flexible credentialing across qualification level from the private sector. It will be challenging for the AQF to remain a useful contemporary instrument. The continuing dynamic nature of competition, changing public sector expectations and policy create a dynamic tertiary sector environment. Timely and responsive mechanisms will be required to ensure that the AQF does not constrain institutional and sector competitiveness, nationally and internationally.

1.3 IMPLICATIONS FOR REVIEW TERMS OF REFERENCE

The following suggested issues could be considered in developing terms of reference for the review and are grounded in the findings summarised above, specifically the aspects of the current framework that impede its effectiveness, the changing dynamics and demands of both education and employment, and international trends in qualifications frameworks and policy.

The principal task for the review is to position the AQF as an instrument that is responsive to emerging needs and able to be readily understood and used by its various audiences, including international ones.

1. Review the structure and description of the AQF components (levels, qualifications and relevant explanations) including the extent to which:
 - a) the relationships between levels and qualifications are clear, appropriate and unambiguous;
 - b) the levels as currently defined are appropriate and fit for purpose;
 - c) the descriptors are expressed in simple language that supports ready interpretation; and
 - d) the knowledge, skills and capabilities reflect and support the full range of learning outcomes required for adaptation and successful participation in work and life.
2. Consider the issue of volume of learning including:
 - a) whether the volume of learning should cease to be expressed in the AQF in terms of calendar years and be replaced by a credit point system;
 - b) whether the disparities in volume of learning between qualifications at the same level can be supported by additional information such as prerequisite learning to dispel confusion; and
 - c) whether the volume of learning can be aligned with other measures of learning volume employed in VET sector specifications and requirements.
3. Review the positioning of vocational education and training (VET) and higher education (HE) qualifications in the AQF and consider:
 - a) whether more explicit differentiation of VET and HE qualifications would be beneficial in general and specifically at levels 5, 6 and 8;
 - b) whether the variety of qualification titles used at the same levels for VET and HE continue to be relevant and meaningful in both the national and international context;
 - c) means by which any implication of a status hierarchy from VET to HE qualifications can be mitigated through changes to the structure or language of the AQF; and
 - d) means by which greater consistency in regulation of compliance with the AQF can be achieved between HE and VET sectors.

4. Review the desirability and feasibility of developing a system for the quality assurance and incorporation within the AQF of sub-qualification credentials such as skill sets, enabling and foundation courses, and in-service and advanced training provided by industry or professions.
5. Consider whether the AQF policies (issuance policy, pathways policy, register policy, addition or removal policy, and principles and processes for alignment with international qualifications frameworks and relevant explanations) (a) are appropriate and fit for purpose and (b) should remain within the AQF itself or be rationalised with TEQSA/ASQA registration and accreditation guidelines.
6. Review ways in which the AQF could more effectively facilitate learning pathways and mobility within and between levels, sectors and qualifications.
7. Consider what changes may be required to AQF governance arrangements, to the AQF itself or to regulation that references the AQF to ensure consistency of its application and ongoing monitoring and review.
8. Given the findings from issues 1 to 7, recommend any necessary changes to the AQF and devise an implementation plan for achieving the changes.

2 COMPARISON OF NATIONAL QUALIFICATIONS FRAMEWORKS

2.1 INTRODUCTION

We reviewed twenty-one national frameworks and six regional frameworks. Summaries of those reviews are in Appendix 4. The main reference for the review was the Global Inventory of Regional and National Qualifications published in 2017^{1,2}. Where this inventory revealed innovative or interesting aspects the original documents were referred to. More than 150 countries worldwide are developing national qualifications frameworks. Most of the research on frameworks has emanated from the European context because there have been significant drivers arising from the need for European networks for qualifications mobility. Regional networks and national networks outside Europe have referenced the European and Australian and New Zealand work in developing their own frameworks. Local social, political, economic and cultural factors influence the final shape of frameworks and their relative emphases in both European and non-European contexts.

Since the 1990s European institutions have played a major role in collaborative effort to harmonise and ensure the quality of educational qualifications across the European Union and more broadly. Numerous international organisations such as the European Commission and UNESCO have been involved and bureaucracies, too numerous to review here have emerged for stimulating and monitoring research and development in educational transparency and quality assurance. A huge array of programs, some named for cities in which meetings have been held (such as the Bologna Process), others for symbolic reasons (Euridyce, Erasmus) with multinational leadership and collaboration continue to proliferate. Initially the emphasis was on schools and universities but the scope has generally broadened to encompass technical and professional education as well. Non-European communities in Asia, the Americas and Oceania have been close observers and participants in these development projects, frequently referencing their published material, attending their conferences and adapting policies and procedures to local needs.

The brief for this research was to compare the AQF with a selection of NQFs with particular reference to:

- The placement of non-tertiary education in NQFs (e.g. primary and secondary education, other forms of skills training, post-formal education).

¹ Cedefop, UNESCO, ETF, UNESCO Institute for Lifelong Learning 2017. Global inventory of regional and national qualifications frameworks 2017. Volume II: National and regional cases.
<http://www.cedefop.europa.eu/en/publications-and-resources/publications/2222>

² Cedefop, UNESCO, ETF UNESCO Institute for Lifelong Learning 2017. Global inventory of regional and national qualifications frameworks 2017. Volume 1: Thematic Chapters.
<http://www.cedefop.europa.eu/en/publications-and-resources/publications/2221>

- Arrangements for credit transfer and articulation in NQFs.
- International innovations in NQFs regarding terminology, design, taxonomy and hierarchy.
- International innovations in NQFs designed to address the needs of anticipated future changes in the nature of work.
- Assess if and how any NQFs consider the following matters and their reasons for doing so:
 - micro credentials
 - volume of learning requirements
 - foundation and enabling courses.

Overall observations about the state of play in relation to qualifications frameworks are followed by discussion of each of these reference points for the review.

2.2 THE STATE OF PLAY FOR NATIONAL AND REGIONAL FRAMEWORKS

2.2.1 Overall state of documentation of NQFs

It bears noting that the quality of published information on frameworks is extremely variable with the Regional Frameworks, the AQF, the New Zealand Qualifications Framework (NZQF), the Scottish SCQF, the Irish NQF, and the Draft Malaysian Qualifications Framework (MQF) setting a high standard. Several of these provide an interactive interface on the framework's website. More detailed aspects of framework design are sometimes not provided in English as is the case with the German, Finnish and Swedish frameworks.

While national frameworks (NQFs) have been in existence in some form in many countries since the early 2000s and before, most have recently (since 2012) reviewed their approach and inclusiveness. Many are in the early stages of implementation and for some the background materials such as volume of learning or relevant policies are not yet available on the websites, or the websites are under development or redevelopment.

2.2.2 Fundamental characteristics of National Qualifications Frameworks

The EU Global Inventory thematic review of NQFs drew conclusions as to the fundamental characteristics of NQFs. These are:

- a legal basis must be established,
- stakeholder engagement assured,
- institutional structures and quality assurance mechanisms must be in place and
- transparency to end users must be apparent.

The AQF in its current governance and regulatory context and in its current form displays these characteristics only partially.

2.2.3 Emergent dominant themes

NQFs are uniformly seen as catalysts for lifelong learning and so need to be able to support diverse learning forms, both formal and non-formal. Following the lead provided by the European Union, education policy makers of most European countries have renamed or refocused their NQFs as National Qualifications Frameworks for Lifelong Learning.

Virtually all of the frameworks reviewed were referenced to their relevant regional framework and frequently to each other which illustrates the global cooperative dimensions of this enterprise. The development of frameworks has been a global enterprise with significant sharing of concepts, expertise and terminology. Consequently, there are no major outliers in terms of innovation or policy objectives. Rather, there are variations on a theme. Some of the themes that might be useful to consider in the review of the AQF are outlined in the subsequent sections of this chapter and in the Conclusion.

2.2.4 Governance and regulation

In some countries NQFs have their own legislation, in others they come under regulations in the educational or workforce legislation or are established within Ministries. There are no discernible systematic patterns and the legislative framework appears to be a function of history and local politics.

Those with their own legislation include:

- NZQF established under the Education Act
- Finland passed the 'Act on a national framework for qualifications and other competence models' in 2016
- Sweden's SeQF has its own law (SeQF Law and regulation 2015:545)
- Indonesia's developing framework has legal enforcement in the form of a Presidential decree
- Malaysia's QF comes under the Malaysian Qualification Agency Act 2007
- South Africa QF was established under the National Qualifications Framework Act 67 of 2008.

Those established within Ministries and other government agencies or as a result of joint ministerial statements or decrees without framework-specific legislation include:

Australia	France
Germany	Scotland (private NFP company)
UK	Ireland
Wales	Netherlands
Norway	Canada
Hong Kong / China	India

Mexico

Saudi Arabia.

In some countries, the Agency responsible for maintaining and administering the framework is also the qualifications and/or quality assurance agency. In others the framework is simply an information and support tool and has no regulatory role. Very few have their supporting policy documents packaged as part of the framework as does the AQF. Most take the approach of briefly describing the policy areas in the framework document while referring for details to the website of the responsible agency.

Some countries state an explicit intention that their NQF will contribute to reform of education and its relationship with labour markets. They include: South Africa, Finland, Sweden, Ireland, Mexico, Saudi Arabia, and Indonesia.

On the other hand, some countries, for example the Netherlands and France, state explicitly that their frameworks have no role in reforming education and training, regulating transfer, access or entitlements to qualifications.

Other countries have frameworks that aim for improvement but are not regulatory: Wales, England and Northern Ireland, Scotland, France, Netherlands, Germany, Sweden.

2.2.5 Policy objectives

2.2.5.1 Information sharing

The most significant universal threads running through policy objectives are transparency, consistency and comparability of qualifications nationally and internationally. Virtually all state an intention to provide more easily understood information about qualifications to the public and employers and international stakeholders.

2.2.5.2 Pathways

The next most common theme is the desire for the NQFs to provide universal access to the education and training system through a range of mechanisms that simplify entry, exit and credit transfer pathways. Because of the capacity of frameworks to aid mobility and adaptability in the workforce some countries (e.g. India, Saudi Arabia, China, Hong Kong) see their NQF as a tool for workforce planning and in some cases (e.g. Germany and India) this is reflected in responsibility for the framework being shared between ministries of education and ministries for the economy or skills development.

The Indian NSQF is focused solely on general education and technical and vocational education and has a strong emphasis on portability and mobility through the system. Its explicit national skill development imperative limits its direct applicability to the AQF. However, several of the NSQF policy objectives encapsulate the types of objectives that are emerging in some countries in relation to the relative positions of general, vocational and higher education:

- Making quality vocational education and training attractive to both young people and employers
- Ensuring both vertical and horizontal pathways are available to the skilled workforce for further growth
- Providing seamless integration of skill training with formal education
- Providing vertical growth pathways in the general education system so that skills training is seen as a valid pathway to degrees and diplomas.

2.2.5.3 Sustainable development goals

The EU Inventory noted a discernible emphasis in the European literature on NQFs in service of sustainable development goals. NQFs in Europe point to a shift in emphasis towards more equitable social goals and the need to ensure that balance is maintained between economic goals and social goals. It is claimed that NQFs go beyond the economic dimension and aim at redefinition of the way qualifications are valued and put into use in society. The rhetoric of NQFs indicates that they could assume a greater importance as policy tools for social and economic reform in addition to being quality assurance mechanisms for portability of qualifications. There is a call for greater integration with broader policy areas such as industry development, environmental sustainability and whole of government agendas.

The Inventory makes the point (Volume 1, Chapter 1) that the domains of learning outcomes are being expanded with a new set of “transversal skills” better suited to the needs of knowledge-rich digital economies. It foreshadows a shift in emphasis from a utilitarian approach to more socially responsive approaches to defining levels descriptors and learning outcomes. This is evident in some of the language that is beginning to appear in descriptors (see below).

2.2.5.4 Social inclusion

Running through most statements of policy objectives for NQFs in virtually all countries that were reviewed for this report is the desire to strengthen vocational training pathways and to develop mechanisms to incorporate non-formal and informal learning into the continuum of learning opportunities and facilitate movement, both vertically and horizontally through the sectors. This is seen as a route to social inclusion and economic growth. Although these intentions are enshrined in NQF objectives in most countries they are in the very early stages of development.

New Zealand specifically identifies as one of its objectives for the NZQF to “contribute to Maori success in education by recognising and advancing Maori worldview and experience”. In the spirit of reconciliation such an objective could also be considered for future versions of the AQF.

These social/economic policy objectives reflect a progression from historical qualifications frameworks which concerned themselves primarily with parity and quality

at degree level as represented by the Bologna process³, to a more explicit desire to use qualifications frameworks to harness and optimise the productive capacity of the entire workforce.

Initially vocational frameworks concentrated on competency-based outcomes for defined vocational qualifications, but the new focus is on bridging the gulf between the academic/professional and vocational/technical education streams and facilitating movement between them. Hence the shift towards inclusive NQFs that cover both sectors, and in some cases also the school sector, extending also beyond the formal to the informal learning opportunities inherent in work and life experience. Malaysia's framework specifically includes as one of its policy objectives to "encourage parity of esteem among academic, professional, technical, vocational and skills qualifications".

More detail on how this is addressed is provided in the following sections.

2.3 PLACEMENT OF NON-TERTIARY EDUCATION

The following table indicates the ways in which each framework reviewed incorporates (or not) pre-tertiary and informal skills training. Since regional frameworks define levels but not qualification names they do not address the issue of whether the learning is within or without the tertiary sector. More detail on validation of informal and non-formal training for credit in formal programs in each country is provided in section 2.6.

In summary it appears that Australia is in the minority in not specifying a level for foundation or entry/school level qualifications within its qualifications framework.

The following table also indicates the extent of overlap between vocational and higher education at each level. Some countries such as Germany, Sweden, Wales, Ireland, Scotland, and the Netherlands appear to offer almost total overlap.

There is considerable variation in definitions and national qualifications traditions, so this table can be viewed only as a thumbnail sketch. Some frameworks' websites give a much

³ The Bologna Process is a collective effort of public authorities, universities, teachers, and students, together with stakeholder associations, employers, quality assurance agencies, international organisations, and institutions, including the European Commission. The main focus is:

- the introduction of the three cycle system (bachelor/master/doctorate)
- strengthened quality assurance and
- easier recognition of qualifications and periods of study

http://ec.europa.eu/education/policy/higher-education/bologna-process_en

clearer picture than others, some of which have a plethora of unexplained acronyms relating to local qualification types.

Country	Pre-tertiary inclusion	Range for technical degrees	Range for higher education degrees	*Developed/ coordinated national approach to validation of non-formal learning
Australia (AQF)	Senior secondary certificate is within the AQF but not assigned a level	Levels 1 - 8	Levels 6-10	No national coordination Supporting policies
Canada	N/A	Levels 1-9	Level 10 -13	No national coordination
China (NVQCS)	China plans to develop a comprehensive framework across all levels including school qualifications. The Modern Vocational Education System Construction Plan (2014-2020) aims to ensure a smooth transition between secondary and higher levels and between vocational and higher education tracks.			Credit Bank for Lifelong Education is in operation in some municipalities
Finland NQF	Level 1 not described in the framework Level 2 – 4 covers school	Level 4-5	Level 5-8	Validation in competency based VET steered by detailed legislation and policies
France NQF	N/A	All vocational and professionally oriented degrees	The Register covers only higher education degrees that have a vocational and	French VAE – validation of acquisition of experience.

* All countries have policies for RPL and validation even if only at the individual institution level. Only a minority have attempted national coordination. They are described in following sections of this chapter.

Country	Pre-tertiary inclusion	Range for technical degrees	Range for higher education degrees	*Developed/ coordinated national approach to validation of non-formal learning
			professional orientation and purpose	
Germany (DQR)	Foundational, general and school leaving certificates not included in framework Level 1 and 2 are vocational training preparation	Level 3 -7	Level 6-8	ValiKom pilot project
Hong Kong (HKQF)	Foundation certificate at levels 1 and 2 The HKQF covers qualifications only in the academic, vocational and continuing education sectors	Level 3 - 6	Level 4 - 7	Regulated RPL available for non-formal and informal learning in the workplace which can lead to award from level 1 to 4.
India (NSQF)	The Indian NSQF has 10 levels and is focused totally on general and technical and vocational education and training. The levels are not tied to qualifications but for each job role and level the Qualification Packs (similar to VET learning packages) and National Occupational Standards are formulated by industry skill councils.			The NSQF is designed to facilitate maximum permeability and recognition of non-formal learning.

Country	Pre-tertiary inclusion	Range for technical degrees	Range for higher education degrees	*Developed/ coordinated national approach to validation of non-formal learning
				Assessment and certification of NFL is quality assured through a centralised system to enhance national consistency
Indonesia	The framework is still under development			In the early stages of development. A credit transfer scheme has been designed to improve mobility across education streams with built in bridging programs
Ireland (NFQ)	Levels 1-2 modular foundational certificates for special needs and no previous experience Levels 3-5 junior school and school leaving certificates	Levels 6-10 Levels 1 to 6 can be conferred by Quality and Qualifications Ireland	Level 7 - 10	National RPL practitioner network and possible national steering group

Country	Pre-tertiary inclusion	Range for technical degrees	Range for higher education degrees	*Developed/ coordinated national approach to validation of non-formal learning
Malaysia (MQF)	Post-secondary only Schools qualifications may equate to level 3 and 4 but this is still under discussion	Levels 1-6	Level 6-7	Supporting policies
Mexico (MMC)	Level 0 - preschool Level 1-2 primary and secondary school	Levels 3-5	Level 6-8	National agreement to allow competence certificates to be equivalent to credits of formal education
Netherlands (NLQF)	Level 1 – entry level	8 Levels do not refer to and are not defined by education sectors, nor are they referenced to degrees or titles. All NQLF levels are open to all qualifications of all sectors if approved		National policy supports validation of prior learning
New Zealand (NZQF)	Senior secondary school	The framework does not distinguish between vocational and higher education by levels. Levels are distinguished only by descriptors		National policy supports validation of prior learning
Norway (NKR)	Level 1 is not part of the NQF and no	Level 3 -5	Level 6 - 8	National policy supports

Country	Pre-tertiary inclusion	Range for technical degrees	Range for higher education degrees	*Developed/ coordinated national approach to validation of non-formal learning
	qualifications are awarded Levels 2 – 4A cover schools			validation of prior learning
Saudi Arabia (SAQF)	Levels 1 to 3 cover general school education and Certificates 1, 2 and 3 for Technical and Vocational Education and Training	Level 4- 9	Level 7-10	Over time intends to develop processes and criteria
Scotland	Levels 1 - 4 are schools or foundational /enabling	Levels 4 - 12	Level 7 - 12	No national coordination
South Africa (SAQF)	Levels 1 – 4 are general and foundational	Levels 1-6	Levels 5 -10	No national system yet exists
Sweden (SeQF)	Level 1- 3 special needs and foundation studies Levels 2-4 school level	Level 5-7	Level 5-8	A national committee (the National Delegation for Validation) was set up to promote a strategy on validation

Country	Pre-tertiary inclusion	Range for technical degrees	Range for higher education degrees	*Developed/ coordinated national approach to validation of non-formal learning
UK – England and Ireland (RQF)	3 entry levels outside the RQF. These 'Entry Levels' 1 and 2 equate with General Certificates of school education and Entry Level 3 equates with A levels	Level 1-4	Levels 5-8	National policy supports validation of prior learning but there is no national strategy or system
Wales (CQFW)	Similar to the UK system although the complexity is explained in the CQFW Fan Diagram ⁴	Level 1-7	Level 5-8	National system for Quality assured lifelong learning (QUALL)

2.4 INTERNATIONAL INNOVATIONS DESIGNED TO ADDRESS THE NEEDS OF ANTICIPATED FUTURE CHANGES IN THE NATURE OF WORK.

2.4.1 Validation of non-formal learning

One prominent response to anticipated future changes in the nature of work is implicit in the new frameworks with their emphasis on flexibility, lifelong learning and portability of learning acquired in a range of formal and non-formal learning contexts including work experience. Virtually all countries make reference to the need for this to meet the social and economic challenges of the future. A more detailed description of validation practices is provided below in the section 2.6.

⁴ <http://gov.wales/docs/dcells/publications/170712-cqfw-fan-diagram-en.pdf>

The European Union has recently completed an inventory of validation of non-formal and informal learning⁵ and concludes that EU Member states are placing validation of non-formal and informal learning higher on their policy agendas. All non-European countries reviewed in this report also report some level of approach to validation of non-formal learning, ranging from intent and early development through to fully formed national coordination systems.

Greater attention has recently been paid to ensuring coordinating institutions responsible for validation are in place at national levels. The EU inventory describes validation in four phases: identification, documentation, assessment and certification. Most validation arrangements described in the EU inventory use a combination of methods including portfolios, tests and examinations but few have standardised tools. The EU has produced guidelines for validation⁶. Most national validation arrangements cover all sectors although some have limited involvement of labour market and non-education sector players. The vocational education sector is mostly involved in validation arrangements. A national strategy is in place in 75% of countries in the European Inventory. The main users are adult learners, workers and low qualified individuals, with a predicted increase in targeting of early skills profiling for 'third country nationals'. Validation is seen as a tool for social inclusion. Funding is an issue and greater scope has been identified for engaging private sector stakeholders in funding support. Governments coordinate the process, training providers carry it out and there is encouragement for employers, trade unions and chambers of commerce to take part as well.

2.4.2 Blurring the boundaries between vocational and higher education

There is an intensive debate in Europe on the future of vocational education at EQF levels 5 to 8⁷. This is apparent in the many national frameworks that allow for a wide range of qualification types at most or all levels. Germany, Sweden, Wales, Ireland, Scotland and Netherlands appear to offer qualifications at all or all but doctoral level in both academic and technical /professional/vocational areas.

The German QF has placed the German master craftsman qualification at Level 6 underlying the principle that vocationally oriented education and training can take place at all levels. Similarly, the Swiss NQF is explicitly designed to show how professional and vocational qualifications operate from level 2 to level 8 of the framework.

The Swedish SeQF is a tool that explicitly opens up qualifications awarded outside the public system, particularly in adult education and in the labour market and is seen as crucial for increasing overall qualifications transparency and relevance in Sweden. The

⁵ Cedefop; European Commission; ICF (2017) European inventory on validation of non-formal and informal learning – 2016 update. Synthesis report. Luxembourg: Publications Office of the European Union, 2017.

⁶ <http://www.cedefop.europa.eu/en/publications-and-resources/publications/3073>

⁷ Cedefop, UNESCO, ETF UNESCO Institute for Lifelong Learning 2017. Chapter 3 in Global inventory of regional and national qualifications frameworks 2017. Volume 1: Thematic Chapters. <http://www.cedefop.europa.eu/en/publications-and-resources/publications/2221>

National Agency for Higher Vocational Education (MYH) was set up in 2009 with responsibility to administer a new and vocationally oriented strand of higher education and training. The MYH higher vocational education offers an alternative to the traditional university sector by combining theoretically and practically oriented learning through new institutions. It analyses labour market demands for qualifications, carries out inspections, conducts reviews and promotes quality improvement. It is supported by an advisory council from all stakeholders and the labour market⁸.

In these ways NQFs can make vocational qualifications at higher levels more visible and contribute to increased diversity of qualifications designed for different purposes. Since higher levels are defined by complexity and increasing levels of autonomy, responsibility and ability to problem-solve and innovate regardless of the classification of the task as academic, professional or technical, the frameworks recognise that any given discipline or technical area involves similar phases of learning progression from basic knowledge and skills through to higher level conceptual and practical performance. The hierarchy allows any learner or their employer to recognise when they have mastered one level and are able to fully contribute by undertaking the necessary training to achieve the next level or to transfer laterally to another job offering similar levels of complexity.

This evolution of thinking away from the traditional three or four sector training model, where each acted as a silo, is reflected in the rhetoric surrounding most of the frameworks reviewed. The review carried out by the EU for the inventory concluded, however, that it is not yet adequately reflected in the policy, funding or structural infrastructure to allow translation of the rhetoric into reality. Old traditions also continue to exert pressure and there is evidence in a number of frameworks of the desire to maintain a higher education framework in parallel with the more modern multi-sectoral frameworks (see the case of Sweden in the following paragraphs).

2.4.3 Flexibility in the types of programs included in the Qualifications Frameworks

Flexibility in size and types of program that can be incorporated with formal qualifications is increasingly regarded by providers and industry as important to allow for timely responses relevant to emerging needs. New Zealand incorporates within its NQF the ability to recognise 'training schemes' which are smaller than full qualifications but can be approved if they are genuinely needed by learners and stakeholders. They are offered by accredited tertiary education organisations. Training schemes must have a coherent structure that allows learners to achieve the learning outcomes and must have an appropriate NZQF level and incorporate sufficient learning to demonstrate progression of knowledge.

The Irish NQF provides for four classes of award at most levels – major, minor, supplemental and special purpose. This allows the framework to recognise all types and volumes of learning achieved by a learner. The modular content of awards, potentially

⁸ <https://www.myh.se/in-English/EQF/>

provided by several different accredited providers (see the directory of validated programs⁹) especially up to level 7 is also emphasised and facilitates the ability for self-paced and self-designed learning programs.

In Finland the NQF aims to improve the transparency and consistency of outcomes-based qualifications across the spectrum of general, vocational education and training, and higher education. The NQF allows for the inclusion of ‘competence modules’ or part qualifications in areas where there is a need for additional post-basic certification and specialisations as part of furthering the development of the ‘lifelong learning landscape’. The framework is used explicitly as a tool for improvement in both quality and relevance of qualifications.

In Scotland the SCQF explicitly aims to have private organisations and employers seek accreditation for their training programs and inclusion on the SCQF database. This inclusion:

- Gives in-house training recognition and a comparison with nationally recognised qualifications
- Helps employees map their learning pathways and gain personal recognition and to progress into more advanced learning programs
- Encourages employees to undertake learning
- Promotes skills development and support skills utilization.

The approach is unit based (supported by credit points) and allows for inclusion and levelling of qualifications of differing character and size. There are more than 11,000 qualifications on the database.

In England and Northern Ireland the Regulated Qualifications Framework (RQF) has just been introduced to set qualification design rules and consistent measures of size and level of difficulty and replaces the old Qualifications and Credit Framework. This is part of a policy to devolve responsibility to awarding organisations and providers so that “high quality vocational qualifications can be designed around the needs of employers, rather than fitting to prescriptive rules”¹⁰. The details of the new framework are not at the time of writing available on the website but each level has between 4 and 15 different award titles associated with it. For example, at level 8 it is possible to receive a doctorate, and a level 8 award, certificate and diploma.

In the Netherlands all Government-regulated qualifications (the qualifications of the Ministries of Education Culture and Sciences; and Economic Affairs; Food and Natural and Living Environment) have had an NLQF-level since 2011. The Dutch Qualifications Framework (NLQF) offers providers of qualifications which are not regulated by the Government the possibility of having their programs and qualifications classified at a level of the NLQF. These qualifications are first assessed and level-determined by the National

⁹ <http://qsearch.qqi.ie/WebPart/Search?searchtype=programmes>

¹⁰ <https://www.gov.uk/government/organisations/ofqual>

Coordination Point for the Framework (NCP) and then recorded in the NCP Register. Non-regulated organisations have to undergo a 'validity' check by the Quality Commission to ensure they are 'trustworthy' to offer programs included in the NCP register.

In Malaysia the Graduate Certificate and Graduate Diploma (both Level 6) are considered to support lifelong learning pathways by enabling learners to progress and to acquire advanced knowledge from a Bachelor or equivalent to the Masters level. These can be conferred after successful completion of formal continuing education to recognise specialist expertise in a field and can also be used as credit towards a Masters. Mandatory minimum credit accumulation for each level is set by the MQF as a Credit-reference Qualifications Framework. Various policies to support credit transfer between programs and institutions are in place. Policies are also in place to allow multiple entry and exit points to the 'ladderised' Levels 1-4 and for provision of flexible and on-line learning.

Sweden offers an interesting if radical model where the SeQF is a tool for opening up to qualifications awarded outside the formal sector.

Sweden has introduced new Higher Vocational Education qualifications at levels 5 and 6 (in an 8 level framework) which are tailored to suit a changing market, so the range of specialisations and programs changes over time. Industry partners play a leading role in developing and teaching the programs and most include work placement. They can be offered by a wide range of educational institutions including universities, local authorities or private training companies. The duration of the programs is between 1 and 3 years, all are at post-secondary level and qualify for student financial aid from the government. Most do not charge fees. Completion of a 1 year minimum program earns the award of Higher Vocational Education Diploma. Completion of a 2 year minimum program results in Advanced Higher Vocational Education Diploma. The Swedish higher education sector is not fully committed to these new flexible vocational programs or the new framework. A separate parallel qualifications framework for higher education is under development and will be referenced to the European Higher Education Area and Bologna process.

Adult and popular education is very strong in Sweden but its links to the ordinary public system are not systematic. The SeQF increases transparency and clarifies options for progress and transfer through non-formal and informal programs into traditional formal programs. Several "non-academic" stakeholders such as the sports sector and the construction industry are interested in using it as a reference for better structured training and progression routes. The institutes that train teachers for VET have used it to identify pathways into training through work experience and formal secondary schooling and to indicate minimum requirements in RPL and qualifications. A new type of formal post-secondary education was also created in 2015 for Arts and Culture courses which vary in duration from a few days to several years, and are all provided by private providers who are subject to state regulation. Many courses prepare students for undergraduate studies in academies for fine arts, music or performing arts, others prepare for direct entry into professions such as dancer or designer.

A rather more extreme version of diversification of training opportunities is offered in Mexico where companies are legally obliged to provide employees with training based on competence standards, and assessment is based on portfolios, observation of work performance, interviews and possibly assessments for the purposes of credit transfer into formal qualifications.

2.4.4 The AQF in comparison

The AQF aligns with international practice in encouraging RPL and credit transfer.

It diverges from predominant international practice, however in placing little strategic emphasis on encouraging validation of non-formal and informal learning for credit towards formal credentials or inclusion in the AQF. While the AQF does not discourage or impede such activity it pays no attention to incorporation of the non-formal sector into the framework proper. There is considerable international impetus towards engagement of the non-formal sector in validating non-formal learning opportunities such as in-service training or community sector practice for credit points towards formal qualifications.

The AQF appears to be a framework that recognises at specific levels only complete programs leading to qualifications. It appears to offer no possibility for sub-qualifications to be assessed at a certain level on the framework to facilitate inclusion as credit towards a qualification. Since the AQF does not acknowledge this possibility as part of the framework it provides no stimulus to national coordination for quality assuring the levelling of segments of programs or shorter courses that might be offered outside registered training organisations or higher education providers.

Structurally there are only three options for education and training providers in Australia – they can be registered as an RTO (by ASQA) or a HEP (by TEQSA) or both. Acceptance of non-formal learning for credit is solely at the discretion of the registered provider with few safeguards as to the quality or validity of those decisions. The Dutch system, for example, does not make that distinction. In the Netherlands for a non-formal unit or program to be approved for recognition on the framework requires simply that the unit be assigned a level by an expert panel and that the organisation undergoes a vetting process to ensure that it is ‘trustworthy’ – it does not need to be classified as aligned with the higher education or the VET sectors.

2.5 CONSIDERATION OF MICRO-CREDENTIALS, VOLUME OF LEARNING, AND FOUNDATION AND ENABLING COURSES

2.5.1 Micro-credentials

The existence of micro-credentials per se does not feature in framework documentation. It is subsumed under the consideration of validation of non-formal learning undertaken outside regular institutional program structures. The other critical component related to this is the recognition in most countries of the need to develop national databases and

information services to promote and facilitate the processes of validation of informal learning or micro-credentials for learners, institutions and employers.

2.5.2 Foundation and enabling courses

At least 17 of the 21 frameworks reviewed address or intend to address, general/foundation and enabling courses within the framework. Several countries incorporate units or community-based courses providing fundamental skills for educationally disadvantaged or 'at risk' groups such as migrants, long term unemployed, and those with a disability. The aim of these sub-programs is to assist the individuals to commence a journey of learning and many are offered by the non-government or community sector who can apply to have them recognised at the appropriate level.

The Irish qualifications framework (NFQ) is a good example of a framework that incorporates foundation studies via the medium of awards from the agency that manages the NFQ and also maintains a directory of programs that it has validated (Quality and Qualifications Ireland - QQI)¹¹. QQI itself actually confers awards for training programs which have been validated at levels 1 to 6 on the NFQ. Awards at level 6 to 10 are conferred by approved institutions.

In Germany while various certificates at foundational and enabling level are available they are not yet incorporated into the DQR. Providers of continuous training and those who provide training for at risk groups see opportunities to become part of the integrated system and offer better progression possibilities. The number of learners in the "transitional sector" is increasing.

Most countries also regard school education as having a place within the framework. Australia's senior secondary certificate sits within the AQF but is not assigned a level. This reflects the history of the development of the AQF and contention about the possibility of assigning senior school studies to level 3 which was traditionally associated with vocational qualifications for skilled tradespeople.

2.5.3 Volume of learning

The most common approach taken to volume of learning is to align it with the European Credit Transfer and Accumulation System (ECTS)¹². ECTS is a credit system designed to make it easier for students to move between different countries. Since they are based on the learning achievements and workload of a course, a student can transfer their ECTS credits from one university to another, so they are added up to contribute to an individual's degree program or training. This credit point approach is also taken in other countries outside Europe who have referenced their frameworks to regional frameworks that are referenced to the EU framework. ECTS is also useful in the context of non-formal learning as a common currency to assess modules and micro-credentials. ECTS credits express the volume of learning based on the defined learning outcomes and their

¹¹ <http://www.nfq-qqi.com/>

¹² https://ec.europa.eu/education/resources/european-credit-transfer-accumulation-system_en

associated workload. Credits can be allocated to all forms of learning including course units, dissertations, and work-based learning. National qualifications authorities and autonomous institutions assess individual units of learning for their credit point value.

In the ECTS sixty credits are allocated to the learning outcomes and associated workload of a full-time academic year or its equivalent. The full-time workload of an academic year is often formalised by national legal provisions but in most cases in Europe ranges from 1500 to 1800 hours which means that one credit corresponds to 25-30 hours of work for the typical student. In New Zealand and Australia 1 credit equates with 10 hours of total learning effort and the notional workload of an academic year is 1200 hours.

In Scotland, Ireland, Sweden, Hong Kong and many other European countries referenced to the EQF, one credit is equivalent to 10 hours of learning time which includes everything the learner has to do whether in a formal supervised setting or as self-directed study.

The England and Northern Ireland RQF defines the concepts “guided learning hours” (GLH) and “total qualification time” (TQT). The guidelines for assigning GLH and TQT were released in 2015 and are complicated¹³. Guided learning hours is made up of activities completed under direct supervision whether through physical or electronic means, and total qualification time is made up of GLH plus all other time taken in preparation or private study. The framework indicates the TQT for all qualifications. All qualifications on the RQF have a ‘size’ which is expressed within the assigned TQT. The credit value of a qualification is TQT divided by 10 (1 credit point equates to 10 hours). TQT and credit points will be assigned to each qualification in the RQF to be released during 2018. Wales uses the same principles according to the Qualifications and Credit Framework (QCF) for vocational qualifications for England, Wales and Northern Ireland and each unit and qualification in the QCF has a credit value (1 credit is 10 hours).

In New Zealand each qualification has a credit value based on how long the program designer considers it would take the learner to achieve the outcomes. Each qualification in the framework specifies the number of credits required at specified levels in order to earn that qualification. One credit is equivalent to 10 notional learning hours (including contact time, assessment and self-study). A typical learner is considered able to complete 120 credits of learning in a year (1200 notional hours). Each qualification in the framework specifies the number of credits required at specified levels in order to earn that qualification.

The Malaysian Credit system is based on academic load which includes all the activities the student undertakes to achieve defined learning outcomes. The notional credit value is one credit equivalent to 40 Notional Learning Hours (NLHs). Credit load per semester is normally no greater than 20 credits and the minimum credit load for each qualification is defined in the MQF. They range from 15 credit points for a Certificate 1 to 90 for a

¹³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/597612/total-qualification-time-criteria.pdf

Diploma, 40 for and Advanced Diploma, 120 for a Bachelors degree, and 130 for a Professional bachelor and/or Honours degree.

2.5.4 The AQF in comparison

Many NQFs do not specify a volume of learning as part of the framework itself. It is possible that such specifications form part of other documentation related to standards for program design that are administered by different agencies. For those that do specify volume of learning in the framework the predominant practice is to define a credit point value for a course unit or a whole program. The credit point value most commonly adopts the ECTS (European Credit Transfer System) credit currency which is based on the total learning time that is judged by the designers of the program to be required to meet the learning objectives. This common currency simplifies the process of awarding credit for non-formal or shorter modules of learning which are becoming more common.

In contrast the AQF defines volume of learning primarily in terms of equivalence of full-time years of study. The credit values are essentially the same as New Zealand but less than Zealand but less than some European countries i.e. a full-time year is counted as 1200 hours which is equivalent to 120 credits at the value of 1 credit per 10 hours. However, by using the language of full-time years to define volume of learning the AQF is out of step with modern learning patterns and the increasingly widespread move to validate all forms of lifelong learning whenever they occur and however long they last.

A change to the expression of volume of learning in terms of credit point values rather than calendar time would bring the AQF more into line with international practice.

2.6 ARRANGEMENTS FOR CREDIT TRANSFER AND ARTICULATION

Qualifications policies and frameworks universally require provision for recognition of prior learning (RPL) and credit transfer (CRT). Credit transfer mostly uses the common currency of credits for units and in most cases the institution being asked to recognise the credit determines how it should be assessed and transferred. The AQF and NZQF provide clear guidelines on this process and are representative of most others. There is, however, scope for a stronger national approach to coordination and quality assurance of credit transfer systems because anecdotal evidence in Australia suggests that standards are not uniform ¹⁴(AQF guidelines notwithstanding).

The process of RPL is more difficult in that it often involves the validation of non-formal or informal learning that has taken place in a number of contexts. Once again, the AQF and other NQFs encourage this process and in some cases provide guidance as to how it might

¹⁴ Ewan, C, 2016. Higher Education Standards in a Disaggregated Learning Environment. Office for Learning & Teaching, Australian Government. https://altf.org/wp-content/uploads/2016/08/Ewan_C_HESP_Fellow_Report_2016.pdf

be done. The AQF provides less guidance than some other country frameworks e.g. the NZQF¹⁵ and it could be enhanced.

Around 78% of the 33 European countries investigated in the EU inventory have links between validation and NQFs and the remainder are working on it. Most non-European frameworks also reference validation and some have commenced national coordination as outlined in the preceding table under Section 2.3. Validation most commonly leads to access to, or credits or modules towards formal NQF awards. It is less commonly used to develop training specifications or award non-formal qualifications.

In general, the same standards are used for validation as for formal education. There has been a shift towards use of existing quality assurance frameworks for validation and increasing use of guidelines as opposed to compulsory frameworks – this highlights the need for a minimum set of quality conditions across validation institutions.

Generally, disadvantaged groups including low-skilled workers, early school leavers, older unemployed, migrants, refugees, older workers and those with disabilities benefit least from validation because information is not widely available, advice is difficult to access and the processes can be particularly challenging to navigate and complete.

Evolving challenges for Europe over the next few years are identified as professional competency and training for validation practitioners, prioritisation of disadvantaged groups, transparency of quality assurance and synergies with credit transfer systems. Progress is required in developing links with related policies especially active labour market policies.

2.6.1 Examples from the NQFs reviewed

2.6.1.1 Scotland

There is no national policy or strategy on RPL in Scotland and providers offering RPL have a wide variety of approaches. Centralised guidance on RPL comes from the SCQFP, the Quality Assurance Agency for Higher Education in Scotland and the Scottish Qualifications Authority. Most RPL is in higher education and guided by the national RPL Framework for Higher Education¹⁶. The governance of the Scottish system is unique in that it is a not for profit company owned by its stakeholders and its responsibilities are instructive. It is not regulatory but provides a national coordination and support system to assist non-regulated providers to establish the worth of their training provision as entry to or credit towards formal learning. Scotland uses a broader range of level descriptors than EQF allowing it to be more explicit¹⁷.

2.6.1.2 Ireland

¹⁵ <http://www.nzqa.govt.nz/providers-partners/qa-system-for-teos/guidelines-recognition-of-learning/#heading2-0>

¹⁶ <http://www.qaa.ac.uk/en/AboutUs/Documents/Recognition-of-prior-learning.pdf>

¹⁷ <http://scqf.org.uk/the-framework/>

Quality and Qualifications Ireland is an independent State agency responsible for promoting quality and accountability in education and training. As well as maintaining the National Qualifications Framework it performs the equivalent of the roles of TEQSA and ASQA and maintains a register of validated programs. It also confers awards below level 7. A significant role it performs is in monitoring access, transfer and progression including RPL. It has a number of published policies and guidelines on validation and RPL¹⁸ and maintains a RPL Practitioner Network¹⁹ which might provide a useful model for Australia to consider. The QQI has also funded research into RPL²⁰ and is participating in an ERASMUS project on the subject.

2.6.1.3 England and Northern Ireland

RPL is used in all formal regulated qualifications to determine entry and exemptions. Workplace learning can be validated through the national vocational qualification framework but there is no system in place to coordinate validation activities taking place in the different sectors and no specific national strategy devoted to RPL.

Progress through non-regulated learning can be recognised through a five stage process – ‘Recognising and Recording Progress and Achievement (RARPA) although it does not lead to certification²¹.

2.6.1.4 Wales

The system for quality assured lifelong learning (QALL) is an integrated pillar of CQFW and is based on the belief that all learning, wherever and whenever it takes place, should be valued and recognised. It is a system of validation of non-formal learning provision which is recognised as a unit on the CQFW. QALL particularly benefits disadvantaged learner groups helping to raise aspirations and promote progression opportunities. It addresses adult and community learning, company training and the voluntary sector.

RPL is developed with different approaches for VET, higher education and adult learning, each developed by the providers themselves. There are no systems to coordinate validation across different sectors and awareness and use of it by both employers and learners is limited.

2.6.1.5 New Zealand

NZ Qualifications recognise learning gained in many different ways. The learning can happen at any stage of a person’s life, in either part-time or full-time study, and in a range of places and ways:

- on-job

¹⁸ <http://www.qqi.ie/Articles/Pages/recognition-of-Prior-Learning-RPL.aspx>

¹⁹ <http://rpl-ireland.ie/>

²⁰ <http://www.qqi.ie/Downloads/Prior%20Learning%20Report.pdf>

²¹ <https://www.learningcurve.org.uk/courses/ladder4learning/resources/rarpatoolkit>

- in education institutions
- electronically
- online
- by distance
- a mixture of ways.

The NZQF does not put limitations on how or where people can learn.

NZQA prescribes the details for credits, cross credits, recognition of prior learning and moderation of decisions through its approval and accreditation rules and all providers are required to have arrangements in place for RPL and credit recognition and transfer. NZQA has established operational principles for credit transfer²².

2.6.1.6 Germany

Legislation is in place for validation of non-formal and informal learning within the VET sector including an external students' examination. There is also a Vocational Qualifications Recognition Act that provides the right for individuals to have foreign acquired qualifications matched to German qualifications.

A pilot project ValiKom²³ is operating in eight chamber districts in Germany. Four Chambers of Skilled Crafts and four Chambers of Commerce are designing a joint procedure to assess and certify vocational skills acquired outside the formal education system. It is a reference project to set up a validation system in Germany addressing adults who acquire skills and competencies through work but lack a formal qualification. At the end of the process the relevant chamber will issue a certificate to confirm and attest the vocational skills acquired by the certificate holder. The target is lower qualified workers and refugees – those who have acquired vocational skills but cannot prove this with formal documents. Several other projects are also in place to develop methods for validation at all levels.

2.6.1.7 France

There are 1300 qualifications on the national register that are accessible via the VAE (translation: validation of acquisition of experiences). The VAE allows any French educational institution to grant degrees partly or completely based on work experience as evidenced in a portfolio. The system is very well developed but is demanding especially for candidates with lower levels of skill and qualifications.

2.6.1.8 Norway

²² <http://www.nzqa.govt.nz/qualifications-standards/recognising-learning/>

²³ <https://www.validierungsverfahren.de/en/home/>

Norway has laws and regulations on validation of non-formal and informal learning for each of the NKR levels. Each institution offering qualifications above level 5 is autonomous and there are no mandated procedures for validation of competence.

2.6.1.9 Sweden

The 2015 Budget Bill allocated SEK 141 million to strengthen validation measures, mostly related to migrants' qualifications and experiences. A new national committee (the National Delegation for Validation) was set up to promote a strategy on validation, and there is a formal consultation on validation preparing a bill to be presented to parliament.

2.6.1.10 Finland

In Finland there is a longstanding principle that candidates without formal training background can be assessed for a qualification and VET qualifications give access to all forms of higher education.

Validation in competency-based VET is well established and steered by detailed legislation and policies as well as quality assurance mechanisms. Validation arrangements for international qualifications and higher education are also well established through national measures, legislation and development projects.

2.6.1.11 China

Lifelong learning is an important strategy in China's education development agenda and academic continuing education, professional training and community-based education are three key areas that will be targeted in the planned comprehensive lifelong learning framework. To bridge formal education with "self-taught" learning the Ministry of Education has instructed several provinces and the Open University of China to develop new ways to apply the recognition, validation and accreditation system of lifelong education credits to distance learning.

Several municipalities including Beijing and Shanghai operate a credit bank system for recognition of learning outcomes and a system of credit accumulation and transfer in continuing education. Different regions have established mechanisms for this e.g. Shanghai Credit Bank of Lifelong Education is operated by the Shanghai Open University.

2.6.1.12 Hong Kong

Hong Kong Industry training advisory committees determine which industries will establish RPL for non-formal and informal learning in the workplace and successful applicants are awarded a statement of attainment (QF level 1 to 4). A credit accumulation transfer system helps learners accumulate credits from diverse courses and convert them into a recognised qualification. One QF credit is 10 notional learning hours in any learning mode.

2.6.1.13 Malaysia

The MQA Act requires a system of credit accounts and credit transfer allows learners to progress vertically and horizontally and have prior learning recognised whether formal or informal. The MQA has developed guidelines, instruments and criteria to assess prior learning and to establish assessment centres. Portfolios and/or examinations may be used.

The MQF (Version 2 Draft p.18)²⁴ states that “it is also likely, in response to consumers demand, alternate credentialing such as micro-credentials, badges etc. will become a part and parcel of the qualifications Malaysian institutions may confer, in the context of lifelong learning. These forms of learning achievements should be quality assured”. There is a specific policy for accreditation of prior experiential learning (APEL) for admission and for credits.

2.6.1.14 Mexico

In Mexico, Agreement 286 confirms that the qualifications framework is designed to give learners access to all levels of the education system by offering an alternative pathway to the formal system. It allows competence certificates to be equivalent to credits of formal education programs at vocational and professional levels. Companies are legally obliged to provide employees with training based on competence standards, and assessment is based on portfolios, observation of work performance, interviews and possibly assessments.

Recognition of non-formal and informal learning is conducted differently in schools, VET, the employment sector and higher education and there are specific programs for certification of competences for disabled people, indigenous non-Spanish speakers, social workers serving these sectors and child and women’s protection.

The Mexican Bank of Academic Credits allows certificates of accredited certification centres to count towards formal educational programs at upper middle and higher levels.

2.6.2 The AQF in comparison

The AQF outlines policies which mandate the availability of credit transfer and recognition of prior learning and provides guidelines for doing so. In this respect it is in line with most other countries.

However, many countries with more explicit social inclusion and productivity underpinnings for their NQFs have recognised the need to go further. There are several directions in which further work might be considered. Discussions might be had at the national level about:

- Setting standards for the assessment of credit and for setting up a cross-sectoral dialogue or community of practice approach to facilitate sharing of experiences and approaches – *See the Irish approach, or RARPA in the UK or QALL in Wales.*
- Creating some sort of credit bank or register accessible to all institutions.

²⁴ <http://www.mqa.gov.my/PortalMQAv3/dokumen/maklum%20balas/MQF%20V2%20DRAFT2.pdf>

- Supporting research into cost effective approaches to RPL – *see Ireland, Germany and Sweden.*
- Better informing the general community and promoting the possibilities for RPL.
- Explaining the opportunities for RPL and for encouraging a range of providers especially in the non-formal sector to make opportunities for documentation and assessment of learning accessible – *See Hong Kong, Finland.*

2.7 INTERNATIONAL INNOVATIONS REGARDING TERMINOLOGY, DESIGN, TAXONOMY AND HIERARCHY

Regional and national frameworks, with few exceptions, are indistinguishable in terminology, taxonomy and hierarchy. The main differences are the variations in types of qualifications classified under each level. Local traditional qualifications offer some idiosyncratic qualifications titles but these are all usually benchmarked to a level consistent with the regional frameworks.

Some frameworks such as South Africa and Wales have additional dimensions based on the statutory authority responsible for approval of qualifications. Wales has three pillars: Higher Education Funding Council for Wales; Qualifications Wales (regulated qualifications outside higher education) and QALL (Quality Assurance for Lifelong Learning operated by the Welsh Government²⁵ but all are tied to the same 8 level framework. South Africa's system is similar²⁶.

The number of levels ranges from 8 to 12 with the major differences occurring at the lower levels and due to whether foundational and school studies are included or not.

Level descriptors are virtually universal and uniform and follow the lead of the various regional frameworks which themselves share common elements. All include knowledge and skills but there are variations on the theme of competence. There are no real variations in intent, only in the degree to which various factors are made explicit. For example, in addition to various expressions of knowledge and skills in the descriptors the following countries offer a broader range of “competence” or application of knowledge and skills descriptors.

2.7.1 Additional descriptors

- Scotland adds generic cognitive skills; communication, ICT and numeracy skills; autonomy, accountability and working with others.
- Canada/Ontario adds awareness of limits of knowledge.

²⁵

<http://gov.wales/topics/educationandskills/qualificationsinwales/creditqualificationsframework/?lang=en>
<http://gov.wales/docs/dcells/publications/170712-cqfw-brochure-en.pdf>

²⁶ <http://www.saqa.org.za/list.php?e=NOF>

- Finland adds responsibility, management and entrepreneurship; evaluation; and key skills for lifelong learning.
- Germany divides each level descriptor into two categories:
 - Professional competence includes:
 - Knowledge – breadth and depth
 - Skills – instrumental and systemic skills, judgement
 - Personal competence includes:
 - Social competence – team/leadership skills, involvement and communication
 - Autonomy – autonomous responsibility, responsibility, reflectiveness and learning competence.
- Hong Kong adds application, autonomy and accountability; communications, IT and numeracy.
- Indonesia adds descriptors for spirituality; personality; working attitudes and ethics.
- The Netherlands adds the specific context in which the learning outcomes are achieved for each level.
- Malaysia adds interpersonal communication, ICT and numeracy/entrepreneurial skills; leadership, autonomy and responsibility; and personal skills and ethical skills.
- Mexico adds resilience, self-reliance, motivation and the “strength to fight for one’s beliefs”; intellectual competences, including the ability to generate new ideas; and ethical competences, including core values and a sense of right and wrong.

2.7.2 The AQF in comparison

In relation to language, terminology, taxonomy and hierarchy the AQF has little to learn from international comparators.

In relation to design the AQF may wish, in order to retain its international standing, to reconsider its approach to pre-tertiary, including both school and Foundation courses, and non-formal studies.

In relation to the design of its communication the present print version AQF is considerably more daunting and detailed in its size and complexity that it needs to be in the information age. For example, the print version of the AQF is 112 tightly packed pages compared with the NZQF which is 36 widely spaced pages. The latter is a much more effective communications tool and could be considered as a model for the next print version of the AQF should there be one. It is open to question whether a print version is even required for the next version.

Even as online information the AQF might benefit from expert editorial revision.

The Irish National Framework of Qualifications provides an interesting model for an interactive online NQF site²⁷.

2.8 CONCLUSION

The EU inventory process²⁸ (p.124 -125) identified some main trends, a selective summary of which provides a suitable conclusion to this comparative review. Those highlighted in bold italics are particularly relevant considerations for the review of the AQF:

- The number of national qualifications frameworks has stabilised at around 150.
- There is extensive policy borrowing and/or policy learning over a relatively short period of time.
- Developments after 2015 show that several national qualifications frameworks (NQFs) have found their place in the education, training and employment policy landscape and are turning into operational entities.
- The first generation of qualifications frameworks (Australia, New Zealand, South Africa and the UK) are fully integrated into national systems but are undergoing continuous change and adaptation.
- The most significant change took place in UK-England where the qualification and credit framework (QCF) was abolished and replaced by a new, non-regulatory framework.
- A tendency towards strengthened regional cooperation between NQFs has been observed since 2015.
- ***The new generation of frameworks (particularly in Europe) differs from first generation frameworks by emphasising communication and transparency rather than regulation and harmonisation. These frameworks are 'loose' in the sense that they have been designed to embrace the multiplicity of education and training sub-systems, institutions and provisions, reflecting a broad range of concepts, traditions, values and interests.***
- ***'Loose' frameworks introduce a set of comprehensive level descriptors to be applied across sub-systems but allow sub-frameworks to retain their own principles and regulations. (The new UK system which is non-regulatory could be described as "loose").***
- ***'Tight' frameworks differ from this by defining uniform specifications for qualifications to be applied across sectors.***
- 'Loose' frameworks, emphasising communication and transparency, are able to aid and trigger reform..... rather than to impose 'one-fit-for-all' rules and regulations.

²⁷ <http://www.nfq-qqi.com/>

²⁸ Cedefop, UNESCO, ETF UNESCO Institute for Lifelong Learning 2017. Global inventory of regional and national qualifications frameworks 2017. Volume 1: Thematic Chapters.
<http://www.cedefop.europa.eu/en/publications-and-resources/publications/2221>

- [There is] a broader NQF perspective which, sometimes in a modest way, addresses a combination of economic and social equity and sustainable development goals. *This broader perspective is closely linked to the increasingly important role played by lifelong learning policies, and by the UN in its sustainable development goals (2015), articulated as inclusive education and training for all.*
- *For an NQF to contribute to these wider policy objectives it must be embedded in the relevant (national or regional) policy context. For frameworks to make a difference, they must interact with and add value to other policies.*
- The new frameworks support learning across institutional, sectoral and (sometimes) national borders.
- *The future success of the QFs very much relies on their ability to make themselves visible and relevant to end-users.*
- Learning outcomes are at the core of national and regional qualifications frameworks.
- *National case studies show that NQFs are part of the country's historical, political, institutional and cultural context and the national qualification and education system and labour market. There is a need for more research and understanding on how NQFs interact with the national qualification systems.*
- *[A]ll frameworks and/or qualifications agencies encourage credit transfer and recognition of prior learning. The same applies to foundation and enabling courses. The core and over-arching issue inhibiting the full potential of these policies is the paucity or lack of sharing of reliable, consistent methods for validating learning experiences and situating them along the levels of the framework.*

3 USES OF THE AQF IN EDUCATIONAL AND NON-EDUCATIONAL CONTEXTS AND POTENTIAL IMPACTS OF CHANGES TO THE AQF

3.1 INTRODUCTION

Searches were conducted on Federal, State and Territory legislation databases to identify legislation and regulations that incorporate mention of the Australian Qualifications Framework (or AQF) in either the title or content of the legislation. The results of those searches are tabulated in detail in Appendices 1 and 2. The database of enterprise and public sector awards²⁹ was also searched using the terms Australian Qualifications Framework, AQF, certificate, degree, credential to identify those in which specific reference was made to the AQF levels and/or qualifications. The results of the search are tabulated in Appendix 3.

In addition stakeholders were asked to provide advice as to the aspects of their work or context beyond the educational sphere that would be impacted by changes to the AQF. Their responses are summarised in Sections 3.4 and 3.5 of this chapter.

3.2 FEDERAL, STATE AND TERRITORY LEGISLATION

A wide range of legislation incorporates specific mention of the AQF. Any changes to the AQF that impact on levels of qualifications will create the need for, at the least, a review of the legislation summarised in Appendices 1 and 2 to determine whether any amendments are required.

3.2.1 Federal legislation

At the federal level legislation, rules and regulations related to education and research involve mention of the AQF in the following cases:

- National Vocational Education and Training Regulator Act
- Tertiary Education Quality and Standards Agency Act
- Higher Education Support Act
- Higher Education Support (VET) guidelines
- Higher Education Standards Framework
- Performance measures of vocational education and training
- Commonwealth scholarships guidelines

²⁹ <https://www.fairwork.gov.au/awards-and-agreements/awards/list-of-awards>

- VET student loans
- Eligibility for Commonwealth supported places
- Funding rules for fellowships and grants programs
- Annual registration fees for vocational education providers
- Coursework awards and specifications of designated courses of study
- Disability standards for education
- Various VET regulation standards
- Migration Specification of Training Benchmarks and Requirements.

Other legislation involving specific mention of the AQF in its regulations or rules relates to the Migration Act, Social Security Act, Civil Aviation safety regulations, Child Care Subsidies, Defence determination conditions of service, Family Law Dispute Resolution Practitioners, Insolvency Practice Rules, Patents Regulations, Telecommunications Cabling Provider rules, Trade Marks regulations, and Workplace Relations Legislation.

In the event of changes to levels and descriptors in the AQF, the necessary amendments to legislation relating to education and research could be significant in number but probably largely non-contentious in content unless there were major consequences for structural or funding arrangements to the higher education or vocational education sectors.

Impacts on other areas of legislation such as migration and social security could also be significant. The impacts have been outlined by the government departments engaged in those areas of policy and are described later in this chapter.

3.2.2 State and Territory legislation

States vary in the extent to which the AQF is specifically referenced in legislation or rules and regulations.

Reference to the AQF is made in:

- Acts relating specifically to school curriculum and assessment, vocational education and training or skills or workforce development, or higher education in South Australia, Tasmania, Western Australia, Queensland, NSW, Victoria, ACT and Northern Territory.
- Acts relating to occupational health and safety in general or in specific occupations in Victoria and Queensland.
- Acts relating to the Rail Safety National Law in Western Australia, South Australia and NSW.
- Miscellaneous Acts – pesticide regulation, teacher accreditation, legal profession uniform admission rules (NSW); agricultural chemical distribution control, payroll tax act (Queensland); liquor control regulations (WA); water management regulations, conveyancing regulations, occupational licencing act (Tasmania).

If there were to be redefinition of levels in most of these cases the need for amendments to specific legislation would be minor. However, there could be flow on issues in relation to industrial agreements depending on the nature of the changes.

3.3 INDUSTRIAL AGREEMENTS

In the industrial relations framework there is a relationship between the AQF and modern awards. The modern awards that reference the AQF or qualifications levels specifically are summarised in Appendix 3. Modern awards may specify given qualifications in the context of job descriptions, wage rates and allowances linked to holding or obtaining a trade certificate, licence or qualification. In general, reference to qualifications relates to either the classification of workers or to their remuneration.

Approximately 90 modern awards contain some element of classification of workers according to their qualification. Several modern awards make specific mention of “training” allowances or trainee minimum wages and a few specify the qualifications involved (stevedoring industry, seagoing industry, mobile crane hiring, mining industry, maritime offshore oil and gas, manufacturing and associated industries, food and beverage manufacturing).

Three modern awards specify minimum wages for classifications of worker according to their AQF qualifications (nursing, hospitality, children’s services).

Several modern awards specify allowances for additional qualifications but are not specific about the actual qualifications (ports and harbours authorities, plumbing and fire sprinklers, marine towage, marine tourism, joinery and building trades, hydrocarbons industry, food and beverage manufacturing, fire-fighting, dredging, children’s services, building and construction, indigenous broadcasting, ambulance and patient transport, indigenous health workers with bilingual skills).

In addition, enterprise agreements are collective agreements made at an enterprise level between employers and employees about terms and conditions of employment. Individual enterprise agreements may reference the AQF or specific qualifications. This research only considered references to the AQF in modern awards.

The Fair Work Commission is Australia's national industrial relations tribunal. It is an independent body with powers to carry out a range of functions including to provide a safety net of minimum conditions by setting minimum wages and terms of conditions in modern awards.

The Fair Work Commission operates under the *Fair Work Act 2009* and is responsible for the application and content of modern awards. Any changes to modern awards are made by the Commission, usually after a process with participation from interested parties such as employer groups and unions.

3.4 POTENTIAL IMPACT OF CHANGES TO THE AQF ON ACTIVITIES OUTSIDE THE EDUCATION SECTOR IDENTIFIED BY NATIONAL STAKEHOLDERS

3.4.1 Statistical reporting

The Australian Bureau of statistics (ABS) is the custodian of the Australian Standard Classification of Education (ASCED). The ASCED comprises two component classifications - level of education (LOE) and field of education (FOE). As ASCED was published in 2001, the LOE classification is based on the AQF Second Edition (published in 1998). International reporting of Australian educational attainment data against the International Standard Classification of Education (ISCED 2011) is currently problematic as the AQF/ASCED LOE does not align particularly well with ISCED 2011.

The ABS is also the co-custodian of the Australian and New Zealand Standard Classification of Occupations (ANZSCO) along with Statistics New Zealand. The ABS and Statistics New Zealand are currently considering undertaking a review of ANZSCO. If a review is conducted there is unlikely to be any significant change to the underlying concepts, but there may be some changes to the skill level boundaries. If the review does proceed, it is planned to be completed by December 2019 and ideally would reference the revised AQF.

The ANZSCO classifies occupations according to two criteria - skill level and skill specialisation. The skill level criterion is measured operationally by three components: the level or amount of formal education and training; the amount of previous experience in a related occupation; and the amount of on-the-job training. The formal education and training component is measured in terms of educational qualifications as set out in the AQF Implementation Handbook Third Edition (2002) and the New Zealand Register of Quality Assured Qualifications (NZ Register). Within ANZSCO, occupations are assigned to one of five skill levels which are defined in terms of AQF and NZ Register qualifications.

The National Council for Vocational Education Research (NCVER) advised that changes to AQF structures could have far reaching implications for:

- National VET reporting including where qualification types are used as skills targets in National Strategies (e.g. targets aimed at raising the proportion of working age population with higher level qualifications (Certificate III and above)
- The maintenance of the National Training Register³⁰ which specifies which training providers deliver which programs at what qualifications levels.
- NCVER information for nationally reported VET data (Australian Vocational Education and Training Management Information Statistical Standard [AVETMISS]).
- Australian and New Zealand Standard Classification for Occupations (ANZSCO) descriptors of skill levels which reference AQF qualifications

³⁰ <https://training.gov.au>

- Unique Student Identifier (USI) transcripts that display programs and AQF level undertaken by VET students
- Time series /consistency of national reporting of VET qualification levels.

3.4.2 Student payments³¹

Changes to the AQF could impact Department of Social Services study assistance payments. For example, although the legislative instrument relating to study assistance payments links directly to courses rather than AQF levels there are break points where different regulations for student payments apply and those break points can be ambiguous or difficult to interpret. Changes to the AQF, if they were to remove these ambiguities would assist in the administration of some student payments. Break points that are relevant in relation to student payment regulations are:

- Certificate IV/ Diploma
- Bachelors/Masters
- Coursework Masters/ Research degrees
- Higher education payment rules and allowances differ from VET even though the courses are at the same level.

3.4.3 Labour Market Policy³²

a) Impacts on Employment Fund

The Department of Jobs and Small Business uses the AQF as an assurance measure so that the training funded through jobactive ³³meets national standards and quality of education set by the Government. All jobactive providers have access to the Employment Fund, which can be used to assist eligible individuals to build experience and skills to get and keep a job by paying for work-related items, training and support that meet the needs of individuals and employers.

Between 1 July 2015 and 31 December 2017 \$128 million was reimbursed through the Employment Fund to providers for Accredited Training. Accredited training:

- must be delivered by a RTO and the course or unit must be on their VET scope of registration (as listed on training.gov.au) and
- must give the job seeker a statement of attainment at a minimum (the exception is secondary education as the training organisation and/or the course may not be listed on training.gov.au)

³¹ Information provided by Department of Social Services

³² Information provided by Labour Market Policy Branch, Department of Jobs and Small Business

³³ Jobactive is the Australian Government's way to get more Australians into work. It connects job seekers with employers and is delivered by a network of jobactive providers in over 1700 locations across Australia.

<https://www.jobs.gov.au/jobactive>

- captures assistance for Cert 1 to diplomas (includes accredited units) plus secondary education.

Depending on the nature of any changes to the AQF, the Department of Jobs and Small Business may need to review the Employment Fund operational policy settings/guidelines and may have IT system changes (e.g. with jobactive providers entering the type of training the job seeker received e.g. Cert I-IV).

3.4.4 Migration and Visa programs³⁴

The *Migration Regulations 1994* (the Regulations) make reference to the Australian Qualifications Framework (AQF) in the following visa programs: Student, Temporary Graduate and Skilled Migration.

a) Student visa program

- The Regulations require student visa applicants to be enrolled in a full-time (CRICOS) registered course of study. In most cases, the course of study leads to the award of a qualification that is linked to the AQF.
- Specific references in the Regulations include:
 - the definition of 'higher education course' - a course of study leading to an award of a diploma (higher education) through to a master's degree (extended).
 - the definition of 'postgraduate research course' - a course of study leading to a master's degree (research) or a doctoral degree.
- A condition of the student visa (8202) requires students to maintain enrolment in a course at the same or higher AQF level for which a visa was granted. However, a transfer from an AQF 10 to AQF 9 is permitted.
- Legislative Instrument IMMI16/019 (English Language Tests and Evidence exemptions for Subclass 500 (Student) Visas) refers to the AQF in exempting student visa applicants from meeting minimum English language test scores in certain circumstances.

b) Temporary Graduate visa

- The Regulations which set out the grant criteria for a subclass 485 (Temporary Graduate) visa, require that applicants must:
 - satisfy the Australian Study Requirement (ASR) in the 6 months before making the visa application AND demonstrate each 'degree, diploma or trade qualification' used to satisfy the ASR is closely related to applicant's nominated skilled occupation.

A 'degree, diploma or trade qualification' in the Regulations is defined by reference to the AQF.

³⁴ Information provided by Department of Home Affairs

- Legislative Instrument IMMI13/013 (Qualifications (Clause 485.231)), which sets out the qualification required for the grant of a Temporary Graduate visa in the Post-Study Work (PSW) Stream, refers to the AQF.

c) Skilled Migration program

Under the points-tested skilled migration category, prospective migrants can earn points for an Australian degree, diploma or trade qualification. The definitions for these terms are in Division 2.6 of the Regulations and each refer to the AQF. One of the definitions of a trade qualification specifically references at least the Certificate III level.

3.4.5 International activity

Department of Education and Training International³⁵ provided the following information on areas in which Australia's qualifications system can be confusing for international students and employers, potentially affecting the employment of Australian graduates overseas as well as the attraction of overseas students to study in Australia.

Changes to the AQF which clarify the issues listed below could potentially have a positive impact for the international education sector:

- Clarification of the large variation of Australian qualifications delivered at AQF Level 3.
- Differences between the Australian Bachelor Honours Degree and Australian Bachelor Degree with Honours.
- Better explanation of Masters Degrees of various compositions and lengths of study.
- Better explanation of distinctions between VET and higher education qualifications at the same levels.
- Clarification of volume of learning and notional duration of study particularly for VET qualifications, and its relationship to learning outcomes.
- Notes describing the way in which alternative forms of education delivery e.g. online education, transnational education are addressed in the AQF.
- Clarification of the design and quality assurance of qualifications involving pathways such as VET to higher education.
- The potential addition of discrete postgraduate vocational qualifications on the AQF (many overseas education systems have postgraduate vocational qualifications).
- Development of a national credit system.
- Review or clarification of AQF policy - Principles and Processes for the Alignment of the AQF with International Qualifications Frameworks.

³⁵ Information provided by DET International

3.5 POTENTIAL IMPACT OF CHANGES TO THE AQF ON ACTIVITIES IDENTIFIED BY STAKEHOLDERS AT THE JURISDICTIONAL LEVEL.

The activities listed below are derived from responses provided by both providers and some government agencies. Only some states' and territories' non-education sectors responded within the time available for this contextual research. Those who responded, however, provide an indication of the range of current uses of the AQF and the possible impacts of changes to the Framework. Responses have been grouped according to functional areas and some activities.

3.5.1 Specific agreements

- The National Partnership Agreement on Skills Reform sets targets using the AQF classifications. The forthcoming Skilling Australians Fund also references and sets training targets for the participating jurisdictions based on AQF classifications.
- Mutual Recognition guidelines.³⁶

3.5.2 Impacts on funding

Many respondents noted that government funding models are linked in various direct and indirect ways to the AQF. For example, in the VET sector eligibility for State Government subsidies for training places is often determined by the level of the course and, in some instances, by the highest level of qualification held by the student. Under the *Victorian Training Guarantee* students may start a maximum of two subsidised courses at the same qualification level in their lifetime. In NSW eligibility for a government-subsidised *Smart and Skilled* course no longer depends on previous qualifications, but the guaranteed subsidies apply only up to Certificate III level. Previous qualifications do not affect eligibility but may affect the student fee. In Queensland, the *Certificate 3 Guarantee* supports eligible individuals to complete their first post-school certificate III qualification. In Tasmania, students who do not already hold a Certificate III or higher qualification also have an explicit entitlement to a government subsidised training place in a Certificate III qualification. In South Australia, eligibility for a government subsidised training place is linked in part to the student's highest accredited non-school qualification.

In the higher education sector, major differences in public funding support for education and training providers and for individuals hinge on the level of a course of study, with different conditions applying at sub-bachelor and bachelor levels, and at bachelor and

³⁶ The Mutual Recognition Agreement sets out the principles whereby Commonwealth legislation, the [Mutual Recognition Act 1992](#), implements the domestic arrangement between the Commonwealth and state and territory governments of Australia. <https://www.education.gov.au/mutual-recognition>

post-graduate levels under the *Commonwealth Grants Scheme* and student assistance schemes such as *Austudy* and *Youth Allowance*.

The different eligibility conditions and funding arrangements attaching to different levels of courses and qualifications clearly have the potential to influence provider and student behaviours and therefore educational outcomes.

It is important to emphasise that the AQF itself is not directly influencing behaviours in this context. However, because funding arrangements through the various programs are differentiated by level, stakeholders make a link back to the underlying qualifications framework, especially where they perceive inconsistencies or inequities in the funding treatment of qualifications at the same level.

3.5.3 Jurisdiction based VET and senior secondary guidelines and legislation

A number of formal VET and senior secondary policy guidelines, legislation or regulations refer directly or indirectly to the AQF, in several states including:

- The Training and Skills Development Act 2016 (which enables the provision in the Northern Territory of nationally recognised vocational education and training that meets the present and future needs of government, industry and the community, and supports employment and economic growth) aligns to the requirements of the AQF in relation to the issuing of Certificates.
- The AQF underpins key legislation, contractual requirements for RTOs and training policies in NSW. These include the Apprenticeship and Traineeship Act 2001, the NSW Quality Framework, and the contract, operating guidelines and related policies for providers approved to deliver government-subsidised training under Smart and Skilled.
- The Training and Skills Development Act 2008 in South Australia relates to higher education, vocational education and training, adult education, and services for overseas students. It establishes the Training and Skills Commission and deals with other skills and workforce development matters. The Act refers to descriptors from the AQF, as part of its definitions and terms.
- Standards for Registered Training Organisations 2015.
- Australian Quality Training Framework Standards for Accredited Courses 2007.
- Standards for VET Regulators 2015.
- Vocational Education Training Regulator Act 2011.
- National Skills Standards Council Standards for Training Packages and NSSC Training Package Products Policy 2012.
- Vocational Education and Training Act 1996 VET (General) Regulations 2009 (WA)
- Apprenticeship Policy (WA)
- Issuing of Australian Qualifications Framework Certification Policy (WA)
- School Based Apprenticeship and Traineeship Policy (WA)

- Trade Certificate Policy (WA)
- State and Territory legislation governing apprenticeships and traineeships
- Victorian Registration & Qualifications Authority (VRQA) state accredited courses and units
- Australian Quality Training Framework in Western Australia
- Australian Quality Training Framework in Victoria
- The School Curriculum and Standard Authority's WA Certificate Education (WACE) requirements for graduation.
- The SA VET recognition register lists VET units and qualifications that contribute to the SACE. In South Australia secondary school students can use some Certificate 3 VET qualifications as part of their ATAR for tertiary entry into undergraduate qualifications.

3.5.4 Impacts on provider registration and accreditation standards

- The AQF is used by ASQA in assessing applications for course accreditation for compliance with both the AQF and the Standards for VET Accredited Courses 2012. The course outcomes are assessed to ensure they align to the AQF qualification specifications for the qualification type and level. RTOs must meet the requirements of the AQF for issuing AQF qualifications and Statements of Attainment. Standard 3 of the Standards for Registered Training Organisations (RTOs) 2015 refers to Schedule 5 of the Standards. Schedule 5 includes requirements relevant for the VET Sector that are not currently included in the AQF Qualifications Issuance Policy.
- Development and delivery of training products including national training packages is derived from AQF qualification types and any significant changes - such as the removal or major changes to qualification types - could have major implications for package design, delivery and staffing if there were not appropriate transition arrangements.
- The TEQSA Act, 2011 and related legislative instruments and Higher Education Standards (Threshold Standards), 2015 determine TEQSA's approach to registration and accreditation matters which involves interpretation relating to AQF levels and descriptors.

3.5.5 Licencing requirements for certain trades

- Licencing regulations for different occupations in different states.
- Many units/qualifications include state licencing requirements
- The ACT construction occupations (licencing) (mandatory qualifications) declaration contains licencing information which lists AQF classifications.
- The NSW Department of Fair Trading may refer to the AQF in setting licencing requirements.

3.5.6 Overseas student and qualifications recognition policies

- Education Services for Overseas Students Act 2000
- National Code of Practice for Providers of Education and Training to Overseas Students 2017
- National English Language Teaching Accreditation Scheme (NEAS) guidelines
- English Language Intensive Courses for Overseas Students (ELICOS) Standards 2018
- Recognition of international qualifications
- Requirements for migration – skills assessment policy and recognition of trade qualifications and experience: Trade recognition Australia

3.6 CONCLUSION

The AQF is embedded in a significant number of policy areas that are formalised in legislation, regulations and administrative and industrial practice. This is particularly so in the area of vocational education and training. It is essential that this level of embeddedness is regarded as a positive feature and does not encourage sclerosis. The AQF is used as a **common reference point** for policy, including funding in some instances, for legislation, for registration and accreditation of providers and programs and for classification of local and international graduates for the purposes of employment, payment or for access to further training or job roles. It **does not, however, regulate** any of these activities.

Major changes to the AQF, for example restructuring or redefinition of the levels, would occasion the need for review of those activities for which the AQF is a reference point. In some cases it may still be possible to operate with an outdated version of the AQF as the reference point (in the case of the Australian Bureau of Statistics their data collections are currently referenced to the 1998 and 2002 AQF versions). Each sector and group that is impacted would have to determine the need for change, the timetable for change and the transition arrangements, which would of course be dependent upon the nature of any changes to the AQF. It would be a case by case basis. In some cases, for example the reclassification of pay grades and allowances, industrial pressures may create some urgency and complexity. In others where Federal / State funding agreements may be impacted, the changes would need to follow a timetable determined by COAG.

In some cases a transition plan may be needed to phase out certain funding agreements and entitlements and to phase in the new entitlements. Where changes to levels necessitate changes to ASQA or TEQSA guidelines it is anticipated that they would follow their usual policies in relation to consultative change management. This would also be the case in many other sectors such as state and territory managed school or vocational education or in the development of new training packages or Masters or Honours degree design. Some changes to levels descriptors may simply render administrative decisions less ambiguous, for example in relation to student assistance payments.

The need for change management is ever present in the modern education and related sectors and transition processes are well known and used. Routine review and accommodation to changes to an instrument such as the AQF would be expected.

There are also a number of related policy areas where change may have potential impacts on the AQF. The governance of the AQF must allow for ongoing surveillance of those policy areas. For example, the ‘Training Product Reform’ review currently underway may impact on or be impacted by changes to the AQF. This is particularly likely in relation to proposed changes to allow qualifications to be constructed to better reflect future work skills and foundation skills in ways which may suggest a need to reframe some levels descriptors and current thinking about progression through levels. Training product reform is also proposing a broader definition of competency than the skills and knowledge featured in the AQF.

The breadth of the current embeddedness of the AQF confirms that it is no longer just a tool for ensuring transparency of qualifications and their national or international comparability. Although its roots lie in those objectives it has come to be used for much broader policy objectives. Both educational and non-educational stakeholders’ expectations are that its utility will continue to evolve in response to changing global requirements for a skilled, flexible and mobile workforce to underpin competitive economies and social reform. The complexity of the current version of the AQF renders it less suitable for these evolving expectations than is desirable and stakeholders have been clear in the areas in which they think review is particularly necessary. These areas are outlined in detail in Chapters 4 and 5.

4 THE PURPOSE, INTENT, SCOPE, STRUCTURE AND BENEFITS OF THE AQF

To provide further insight into the issues for possible consideration by the formal review of the AQF, we:

- examined previous reviews of the AQF and other relevant policy reviews and reports (see section 4.1 below); and
- conducted a preliminary round of stakeholder consultations. Issues raised by the stakeholders are summarised in section 4.2 and their views on the benefits of the AQF are summarised in section 4.3. Stakeholder comments on detailed aspects of the AQF levels, their descriptors and their relationship with qualifications are considered in Chapter 5.

NOTE: For the purposes of this contextual research, lists of stakeholders across industry, professions, higher education, vocational education, public and private providers, state and territory jurisdictions and Australian Government Departments and overseas qualifications assessment agencies were compiled and the peak body for each group was approached to provide responses to questions tailored specifically to the engagement of their sector with the AQF. The request was framed as a scoping exercise to inform the AQF review and it was emphasised that the review would provide opportunity for full consultation of their memberships and formal submissions. The short timeframe in which the contextual research was conducted over the summer holiday period precluded a comprehensive canvassing of individual organisations and did limit the scope of consultation. General responses are synthesised in this chapter. Specific responses related to each of the levels of the AQF are summarised in Chapter 5.

4.1 ISSUES RAISED IN PREVIOUS REVIEWS OF THE AQF AND RELATED POLICY REVIEWS AND REPORTS

We examined a range of relevant recent reviews and documents produced in Australia relating to the future of work and the training environment as well as to the AQF more specifically. An important source of contextual information was the submissions provided to the 2009 – 2011 review of the AQF which resulted in the present version of the Framework. Many of the comments made then and outlined below remain pertinent and prominent in responses provided to this contextual research in 2018. This signals an opportunity for a more fundamental examination of the expectations underpinning the current version. Published material from the industry and employment sector over the past few years provides added insights into the expectations for a qualifications framework in relation to flexibility and mobility in the workforce.

4.1.1 Issues raised in the 2009-2011 review of the AQF which resulted in the revised 2013 version.

The responses to the AQF 2009-2011 review from stakeholders in the skills/workforce area provide limited but useful insights into factors that might impinge on policy objectives for a revised AQF in 2018. Submissions to the AQF Council's consultation paper *Strengthening the AQF: An Architecture for Australia's Qualifications* (2009) were shaped by the policy context at that time reflected in the main outcomes of the 2009-2011 review identified by the AQF Council, namely:

- building confidence in qualification outcomes
- improving student pathways
- enhancing the mobility of graduates
- enabling mapping of Australian qualifications against those of other countries.

The 2009 consultation questions referred primarily to:

- the appropriateness of the proposed attributes and criteria for each level
- the qualification types descriptors
- whether the notional duration of student learning was a sufficient measure for each qualification type
- the extent to which the location of each qualification type reflected coherence between the qualification type and the level
- mechanisms needed to ensure consistency in application of the qualification requirements.

Responses to the review questions dealt mainly with the structural and substantive issues around content of the framework.

4.1.1.1 Structure of the AQF

Two issues concerning the architecture of the AQF were identified in the original 2009 – 2011 review and continued to be prominent in responses to this research:

- the potential for confusion in the market where qualifications are issued by both VET and higher education institutions; and
- the possibility of artificial inflation of some qualification awards in terms of the complexity and volume of learning.

The widely shared starting point of the comprehensively argued ACCI submission to the 2009 -2011 review was the need for a skilled, flexible and motivated workforce set in the context of lifelong learning. In terms of the overall design and language of the AQF, the skills/workforce sectors wanted then, and still ask for, greater clarity and simplicity in the framework with easily identifiable levels and easily understood progression of learning outcomes. The consistent use of learning outcomes over ten levels was strongly endorsed. On technical and administrative matters stakeholders responding to the 2009-2011

review wanted consistency in the use of terminology such as 'generic skills' and minimising and streamlining of information in testamurs.

Some submissions to the 2011 review questioned the AQF Council's rationale for fixing on ten levels, suggesting the need to better reflect the diversity of training contexts. For example, the Australian Chamber of Commerce and Industry (ACCI) supported consideration for the AQF to move to 11 levels. This suggestion was based on the view that it was inappropriate for the Graduate Diploma (Certificate) to be on the same level as the Bachelor's degree and that an additional level would better accommodate a sense of progression in education and training pathways. They suggested that Level 7 should be Bachelor's degree, Level 8 Honours and Graduate Certificates, Level 9 Graduate Diploma, Level 10 Master, Level 11 Doctoral degree.

ACCI and AIG submissions to the 2009 -2011 review focused particularly on the need for the framework to enable smooth articulation between sectors and also to provide a fair reflection of the knowledge, skills and competencies gained by the qualification holder. It emphasised the importance of flexibility particularly structuring partial qualifications and statements of attainment to encourage pathways and linking formal education and informal learning. This desire continues to be articulated in the present consultations.

4.1.1.2 Placement of the Senior Secondary Certificate of Education (SSCE)

Some lessons for current policy objectives might be drawn from the past debate over the placement of the SSCE. In the AQF 2010 draft SSCE qualifications were located as a qualification type at level 3. The response from the skills/workforce area in submissions to the 2009-2011 review was strong and universally negative.

The response from Construction Industry Training Services put the latter issue plainly:

It is difficult to see that a completion of a Senior Secondary Certificate of Education can be of the same complexity as a Certificate III Apprenticeship program such as Heavy Diesel Mechanic, Electrician, Plumber etc. (CITS 2010)³⁷

It was widely agreed that the alignment of the SSCE at level 3 should be eliminated and that the AQF Council should create a separate stream for the SSCE. The current version of the AQF places the SSCE and criteria for qualifications as a standalone stream noting that VET is increasingly offered in the school sector.

The concerns of stakeholders in 2009 around the SSCE are indicative of related issues for policy objectives. They include, for example, the need to:

- recognise the complexities of the varying VET in Schools units, Higher Education subjects and general curriculum subjects

³⁷ Submission to the Consultation paper on Strengthening the AQF 2010 from Construction Industry Training Services

- avoid equivalency issues with industry derived competency-based qualification outcomes
- avoid the watering down of industry requirements
- avoid potential undervaluing of the trade qualification at Certificate 3 and the Certificate 2 qualification.

4.1.2 Issues raised in other recent policy documents and reports related to future skills needs

Other recent reports with potential implications for the future of the AQF raise issues relating mainly to the broader policy context and to the boundaries between VET and higher education.

4.1.2.1 Broader policy context of the AQF

Chapter 3 and stakeholders' interests in both 2011 and for this contextual research indicate that the AQF exists in a complex context at the intersection of social, economic, development and training objectives. It is not simply an instrument for comparison and validation of educational qualifications. This fact is evident in many NQFs in other countries where statutory responsibility for NQFs sometimes spans government departments of industry and development as well as education.

The pace of change in the nature of work and in demography has stimulated considerable energy in scoping future learning and skills needs. Recent commentary and ongoing work by a number of agencies including the Productivity Commission, NCVER³⁸, ASQA³⁹ and industry representative groups⁴⁰ have made it clear that the AQF is regarded as a central plank in ensuring Australia's future prosperity. To enable it to fulfil that responsibility it needs to be a living, responsive document which, while not abandoning history, is also capable of supporting a vision of the future which is not impeded by historical and structural constraints.

The Productivity Commission Report 'Shifting the Dial'⁴¹ in its Chapter on Future Skills and Work offers a comprehensive range of recommendations, among them that:

The Australian Government should develop a framework to facilitate the independent accreditation of skills obtained through any learning method (Rec 3.3).

³⁸ Siekmann, G & Fowler, C. Identifying Work Skills: International approaches. NCVER, 2017, p.10.

³⁹ ASQA course duration strategic review <https://www.asqa.gov.au/about/strategic-reviews/course-duration-2017>

⁴⁰ Future-Proof. Protecting Australians through Education and Skills, Business Council of Australia, October, 2017.

⁴⁰ ACCI 2012. Personal communication, email response to Chair of AQF Council, 27 July, 2012.

⁴¹ Productivity Commission Inquiry Report No 84. Shifting the Dial. 5 year Productivity Review. 3 August, 2017. <https://www.pc.gov.au/inquiries/completed/productivity-review/report/productivity-review.pdf>

The Australian Government should ensure that Australians of all working ages can readily access comprehensive and up to date information about career and education options, including how to make career changes later in life (Rec 3.5)

These two recommendations reinforce the need for a policy framework that effectively underpins quality assured learning through any method, providing appropriate options throughout a career span.

Related to similar concerns is the ongoing consultation on training package reform⁴². The following proposed changes to training products will have significant implications for the AQF if implemented:

- construction of qualifications with units of competency across three categories - technical competencies - as the core of a qualification, future work skills, and foundation skills
- a broader definition of competency to encompass specific knowledge and skills requirements
- establish 'banks' of units of competency to expedite training product development and reduce duplication,
- stronger links between skill sets and qualifications.

On a broader level there is also a risk that the AQF is less useful than it might be if it were better integrated with other policy areas and agencies. The National Centre for Vocational Education Research has pointed this out in relation to work skills information sources:

Australia already supports multiple information resources and repositories for existing skills, occupations and qualifications, for example, JobOutlook, managed by the Department of Employment; ANZSCO; training.gov.au; MySkills.gov.au, the Australian Core Skills Framework (ACSF), the Core Skills for Work Development Framework (CSWDF) and the Australian Qualifications Framework (AQF). International evidence and comparisons suggest that the full potential of these various resources may be unrealised, given the lack of an up-to-date and widely accessible integrated skills information framework.⁴³

4.1.2.2 Boundaries between vocational and higher education

The AIG 2016 report *Making Apprenticeships Work*⁴⁴ notes that the 2015 *Review of Training Packages and Accredited Courses* raised the prospect of developing new preparatory qualifications of a broad nature that would be suitable for VET in Schools. AIG suggests piloting links from apprenticeships to higher-level qualifications in the VET and Higher Education sectors.

⁴² Training product reform: Issues for discussion, December 2017. www.education.gov.au/VET-consultation.

⁴³ Siekmann, G & Fowler, C. Identifying Work Skills: International approaches. NCVET, 2017, p.10.

⁴⁴ http://cdn.aigroup.com.au/Reports/2016/15160_apprenticeships_policy_full.pdf

The Business Council of Australia⁴⁵ suggests (among other things) that, to prepare for jobs for the future:

- schools, VET and higher education sectors will need to operate as one system
- education must be seen as a lifelong journey extending beyond institutional learning
- culture change must occur in tertiary education so that VET and HE form a genuine tertiary system rather than two silos where VET is stigmatized.

The ACCI response to a review of the graduate and vocational graduate certificates and diplomas in 2012⁴⁶ included a proposed level 9 Graduate Diploma to differentiate the Graduate Certificate and Graduate Diploma which are both at level 8 along with Honours. ACCI also questioned why the AQF placed emphasis on the concept that progression is generally one step at a time when this was not often the case for VET. ACCI also called attention to the different starting points between people who undertake a qualification on the basis of extensive experience, but lack a Bachelor degree, and those who have no experience.

Concerns about the need to differentiate these qualifications persist in responses to consultation for this project and come from both VET and higher education sectors. See below and Chapter 5.

4.2 ISSUES RAISED IN THE STAKEHOLDER CONSULTATION PROCESS FOR THIS CONTEXTUAL RESEARCH

4.2.1 The stakeholder consultation questions

Broadly the questions posed in the consultation covered the following issues:

- What issues would you wish to see included in the terms of reference for the 2018 review?
- What is the benefit of the AQF to your organisation and in what contexts do you use it? Are there aspects of the AQF that are helpful and that you would not wish to have changed?
- Are there aspects of the AQF that create difficulties in your sphere of activity that you would like to see addressed?
- Do you believe that the current AQF is sufficiently flexible to accommodate foreseeable or projected changes in the professional, industrial or work environments with which you are engaged?

⁴⁵ Future-Proof. Protecting Australians through Education and Skills, Business Council of Australia, October, 2017.

⁴⁶ ACCI 2012. Personal communication, email response to Chair of AQF Council, 27 July, 2012.

- Please identify any areas of your activity that could be significantly impacted by any changes to the AQF. Are you aware of any formal regulations, legislation or formal policy guidelines that could be impacted?

Responses to questions asked as part of the consultation process varied from general comments about the utility, impact and purpose of the AQF to specific comments about experiences with various aspects of implementation, especially in each of the levels. These responses are grouped thematically and summarised below. Phrases in italics are direct quotations taken from personal communications and interviews to provide a flavour of the tenor of opinions expressed. Some of the responses to the last question have been summarised in Chapter 3.4 and 3.5.

4.2.2 Purpose and intent of the AQF

While virtually all respondents recognise the value and benefits of the AQF (see section 4.3), a significant number of responses across the sectors questioned the intent and purpose of the AQF which appears to have shifted since the introduction of TEQSA and ASQA: *is it a framework or reference point or standard?* While this may be largely a question of semantics the review could clarify the status of the AQF in this new regulatory environment. It is a source of confusion for international audiences as well as local providers. ASQA indicated that “it is not clear in the AQF what Registered Training Organisations (RTOs) are required to comply with”.

Some respondents argued for an even more fundamental reconsideration of the purpose of the AQF: *a review needs to go back to first principles – is the AQF about a quality and learning framework or is it purely a ladder?*

4.2.3 Scope of the AQF

Several respondents across sectors signalled that it might be timely to *reconsider the extension of the AQF into the school sector* (see Chapter 5).

A few respondents from the professions noted that it might be timely also *to extend the AQF into the post-graduation or professional sector* such as professional qualifications/credentials obtained from professional associations outside of the formal education system. For example, specialist medical training requires many years of post-graduate training but is only recognised as a fellowship with no standing in the AQF. This could have potential implications for international recognition.

Almost all respondents indicated in some form that as the pace of technological and information change accelerates learners and employers are increasingly looking outside the AQF qualifications mix to gain “on-time”, “in place” skills development or micro-credentials. As noted in Chapter 2, some other NQFs offer the opportunity for individual units of learning offered by other than registered tertiary providers to be accredited at specified levels and therefore to be more easily credited towards formal programs. This echoes the Productivity Commission recommendation cited above. In Australia this is presently achieved, if at all, through a broad range of RPL decisions which are not standardised across institutions.

Noting that “there is no real place for work-ready degrees” in the AQF, TAFE Directors suggested enhancing the ability of the AQF to admit new types of qualifications such as degree-level apprenticeships that have recently been introduced in parts of Europe including Ireland and the UK.

One university noted that the current AQF is built upon a traditional range of qualifications which does limit the scope for delivering accredited shorter courses.

It was noted by respondents in the professions that many specialist and niche fields lack scale and are becoming increasingly unviable for higher education providers to service. Some professional bodies are looking for ways to provide professional certificate training via RTOs and to have this recognized in the AQF.

Some schools sector stakeholders highlighted the need to review the fact that the AQF currently does not recognise programs that do not have the full breadth and depth of a qualification. The use of qualifications as the only means of recognising and valuing education and training fails to recognise that many industries value skill sets or a single unit of competency.

4.2.4 The positioning of the VET sector in the AQF and issues at the VET/HE interface

Currently, the AQF is perceived by many to be *weighted to the Higher Education sector and sometimes definitions are applied differently within the Vocational Education and Training (VET) sector*. It was suggested that definitions within the AQF could be expanded to reflect their context of application e.g. distinctions between K-12, VET and Higher Education contexts.

A significant number of comments relate to the lack of clarity of the role of VET within the AQF:

- According to some in the VET sector the AQF has lost the connection between the workplace and the education /training context that used to exist in the Australian Standards Framework. This was ameliorated somewhat by inclusion of the AQF level in the codes of the units of competency for Training Packages. The inclusion of an AQF level within each unit which ceased in 2014 had enabled them to be linked to a qualification level, to express a level of sophistication that was independent of the qualification in which each unit was embedded, to guide trainers and (particularly) assessors on the level of complexity intrinsic to the unit, and to help make a re-connection with the workplace. However, installation of qualifications as the only end point of the AQF fails to recognise that many ‘qualifications’ are only a single unit (such as licensed high risk skills).
- Most industry stakeholders raised concerns that the Qualifications Pathways Policy is not widely understood and not actively applied, particularly in relation to pathways between qualifications and sectors. The current training reform process is considering development of a bank of common units to promote cross-sector qualifications. The AQF review could consider similar possibilities.

- Some feel that the VET sector is not represented sufficiently in the current AQF and needs further expansion. A key issue is the identification of skills sets and units of competency.

There is a widely held view that the AQF has not created seamless pathways between the levels and has not removed inconsistencies between HE and VET provision and credit: *the hierarchical levels are associated with increasing status but if a lifelong learning approach is taken then individuals could assess the limits of their competence at any given time and “evolve into different parts of the framework”, up or down or sideways.*

The majority of respondents pointed to the increasing need for clarity and simplicity around qualification types as boundaries between higher education and vocational education dissolve and blur. Most believe that *the historical development of the AQF in its current form has limited its flexibility for future needs.* It has been described as being *“formed by sticking to the existing product mix and assigning them to levels”, rather than as a successful attempt to define increasing levels of complexity in learning experiences.* It also attracts criticism as a two-dimensional ladder built on an outmoded school-based model where learning is traversed in only one direction – from bottom to top. A few have suggested it needs to be more “three-dimensional” which implies that it needs to offer greater recognition and encouragement for moving across and around levels and sectors.

One university suggested that embedded assumptions regarding the division between Higher Education and Vocational Education at the lower level of the AQF could usefully be reviewed, specifically, in relation to the delivery of pre-tertiary programs. Currently, pre-tertiary foundation programs are typically offered as non-award programs. Similar concerns arise with the capacity to certify smaller components of awards, such as stackable credentials comprising four or more subjects.

It is generally agreed that when the levels descriptors are read they are not really contestable – *the problem comes when the levels are overlaid by the reality of real world application. The problem is in the assumptions and interpretation behind the words.*

4.2.5 Structure and terminology of the AQF

There were many comments about the complexity of the AQF and the various policies attached to it.

In comparison with other NQFs the AQF does seem overly complex and detailed. Several respondents questioned the need for both ‘level criteria’ and ‘qualification type descriptors’ and claimed that the existence of both created confusion and lack of clarity for compliance. In particular several respondents note that close similarity between levels and qualifications descriptors is confusing for users. Several respondents pointed to the need to integrate interpretive advice from AQF, TEQSA and ASQA into a single document.

Similarly, there were numerous comments about areas of ambiguity or lack of clarity in the AQF, for example:

- *There is confusion in the market place about what AQF is. The average person does not understand it. There is too much “technical lingo”.*
- *In many cases the words describing increasingly higher levels of learning outcomes are open to (mis)interpretation. If examples are not possible, perhaps a glossary of descriptors used, and their meaning, would be useful (like the glossary of terms already included). For example, an explanation of the difference between ‘expert judgement’ and ‘authoritative judgement’ – in what cases would an expert judgement not be authoritative?*
- *There seems to be duplication between descriptors and specifications rather than clarity about the differences.*

Respondents noted that the AQF descriptors for each AQF level vary from the qualification type descriptors. For example, the AQF level 5 criteria listed on page 38 of the AQF Second Edition are less extensive than the Diploma descriptor although the Diploma is a level 5 award. It would be simpler to have the same descriptor for each AQF level and the corresponding qualification to that level. This would simplify the process of developing exit awards within nested degrees (for example Diplomas and Associate Degrees nested in Bachelors degrees) that are mapped to the relevant AQF criteria.

It is argued by many that the descriptors, knowledge, skills, and application of knowledge and skills is vague. Some VET providers note that the AQF provides little guidance in terms of discipline specialisation, and the appropriate share of the qualification that should be devoted to the discipline. This also relates to the fact that little guidance is provided as to how core skills (and the Core Skills for Work Framework) should be integrated into the AQF.

Some argue that the application of the AQF is potentially so flexible that employers and the community cannot readily understand the meaning of the distinction between levels. For example, the application of the AQF in vocational training allows the same units, assessed in the same way, to be used in vocational qualifications at different AQF levels. This also applies in the higher education sector.

The unclear extent to which lower level qualifications are embedded into higher level ones is a recurring theme. For instance, it is unclear as to whether a diploma includes an embedded certificate, both in terms of volume and level of learning, or whether these qualifications are parallel. Related to this is the flexibility of Training Package rules that allow units of competency to be imported from lower level qualifications. Some in the VET sector fear that this dilutes the qualification outcome, which could be addressed by tighter specifications for qualification outcomes. Similarly, qualifications which contain “nested” units of competency which are delivered at all AQF levels, may not reflect the capabilities, or skills and knowledge described in the Framework.

4.2.6 Flexibility and attention to 21st century needs

Many respondents raised issues relating to the fitness for purpose of the AQF in a rapidly evolving context of major changes in education, training and the nature of work. Some noted the potential risk that the AQF could constrain valuable and necessary innovation.

- *The current AQF model of degrees as ‘isolated exercises’ does not acknowledge the widely implemented changes in pedagogy across the sector since 2009, particularly a “greater and more nuanced understanding of how learning is in fact achieved”.*
- *Does the AQF stifle or enable – has the interpretation become too rigid?*

Most respondents across the sectors comment that generic transferable skills, such as critical thinking, innovation and digital literacy, should be incorporated into all AQF levels including the SSCE. Respondents from the university sector suggested that the AQF should use the terminology now used in the Higher Education Standards Framework.

Several respondents suggested consideration of whether AQF level descriptors can address lifelong learning attributes that assist students to adapt to a changing world of work and identify capabilities as a separate descriptor alongside “skills”.

Respondents from various professions noted that the AQF may not have anticipated the growing incidence of articulation between professional fields such as many advances in the intersection between information sciences and medicine and health care and that the current structure does not facilitate it. They pointed out that for the AQF to have longevity it needs to adapt to the labour market, for example can rapidly emerging new job categories and skills be adequately classified in the AQF levels? Is coding paraprofessional, skilled or unskilled?

Several respondents raised the question as to whether a qualification should be the primary structure of skills acquisition and suggested that smaller units of learning further differentiating between specific skills and knowledge, rather than an all-encompassing AQF level, may be better suited to future workforce structure. It was suggested that the AQF could be further developed into a stream of sub-qualifications at levels to recognise the discrete and add-on nature of current education demands. This would allow greater flexibility in student achievement and support from industry.

Examples of ways in which the AQF may at times constrain higher education innovation and market responsiveness were frequently encountered in discussions. The AQF does not always map well to particular sector needs and internationally benchmarked practices. Examples of programs in Engineering and Psychology were given that did not fit the AQF model and programs that were meeting industry needs and international accords had to change to fit into the AQF. It was argued that in the higher education sector prescriptive requirements (e.g. relating to typical volume of learning) have restricted providers’ ability to offer affordable and flexible course options that meet the needs of postgraduate markets.

4.2.7 Addressing micro-credentials and other non-traditional program structures

Comments around micro-credentials were prominent in response to questions about flexibility and future-proofing of the AQF.

A succinct statement provided by one university on micro-credentials sums up the issue:

Micro-credentials of all shapes and sizes are now being implemented – before this becomes a confusing mess, national qualifications frameworks need to take account of them, and attempt to provide guidance.

As pointed out by the Productivity Commission 2017 Report⁴⁷ the increasing pace of technological change means that the AQF and the training products that can be developed from it must be able to respond. Qualification classifications may need to be supplemented to formally recognise shorter micro-credentials or other arrangements that enable workforce skills to remain relevant and up to date. The capacity to customise qualifications is also a growing imperative, to ensure students have the knowledge and skills that maximise their mobility in the labour market.

The increasing use of micro-credentials in industry will have an impact on qualification frameworks and their ability to provide recognition and credit for this type of learning. The trend towards “constructed” qualifications may also affect the relevance and standing of the AQF. The ability for students to undertake individual units of competencies or skill sets and then add to these to build qualifications is already available under the present system. Such an approach could be one way to build broader qualifications from micro-credentials. New Zealand is currently conducting a pilot project on dealing with micro-credentials in the qualifications system⁴⁸.

Digital technology is impacting pedagogy and facilitating the way people learn. The simplest example is the acquisition of small pieces of learning (skills) delivered on a mobile platform in the workplace for which a worker receives a credential. The AQF structure may require adjustment to accommodate the increasing demand for shorter programs that blend a range of learning and are available sooner, perhaps through greater use of formally recognised skill sets or micro-credentials able to be articulated into formal qualifications. AQF courses of 1-2 years in duration may become less relevant in many areas. Non-permanent work and the “gig” economy are likely to lead to more demand for micro-credentialing of specific skill sets.

Some commentators suggest that higher education is under threat, and that while qualifications are still necessary additional credentials will become increasingly important in many areas. Micro-credentialing is being put forward as a model for articulation and

⁴⁷ ⁴⁷ Productivity Commission Inquiry Report No 84. Shifting the Dial. 5 year Productivity Review. 3 August, 2017. <https://www.pc.gov.au/inquiries/completed/productivity-review/report/productivity-review.pdf>

⁴⁸ <http://www.nzqa.govt.nz/about-us/future-state/quality-assurance/micro-credential-pilots/>

top-up of skills. The AQF will need ongoing adaptation to these trends to maintain its relevance.

All of the universities that provided a response noted that micro courses that sit outside the AQF are increasingly of interest to universities. While such courses should be able to be developed and stacked to an AQF qualification (if required) the work is cumbersome given the constraints of the AQF, particularly at AQF 8/9. The difficulties are outlined in Chapter 5.

The AQF does not currently facilitate shorter courses such as micro-masters or reference the possibility of the modularisation of qualifications through the progressive accumulation of units of study at the appropriate AQF levels. This is a commonly held view among universities. One respondent described it in the following terms:

- *Mature professionals often want fresh smaller credentials to signal their skills or experience. The age of micro-credentials is well and truly upon us, yet the smallest and shortest postgraduate qualification is the Graduate Certificate with which there are at least two challenges:*
 1. *it is longer than most micro credentials, and equivalent in the current AQF to about six months full time study (or typically four units of study); there is an opportunity to make one unit of study (which currently earns credit that expires) a stand-alone postgraduate qualification that can also be stackable towards a larger qualification. This would entice more Australians to seek shorter and less expensive qualification, and more importantly, to keep learning.*
 2. *the title is uninspiring and not competitive internationally: against the UK "Postgraduate Certificate", the Australian "Graduate Certificate" looks less compelling, and the word "certificate" is weak.*

Many respondents across all sectors highlighted the fact that micro-credentialing is an emerging issue. In some sectors, particularly information technology, students are compiling a number of short courses and skill sets together into a package that meets industry needs. The AQF, providing only for levels to be applied to complete qualifications does not readily facilitate/accommodate this and it is a growing area. The potential use of block-chains to access and verify this type of qualification is also the subject of considerable discussion.

Many also suggested that the Review should explore ways in which the AQF could improve accreditation for skill sets, part qualifications and short courses. Current VET debates on the benefits of skill sets compared to full qualifications raise questions of whether skill sets will be needed more in the future. In addition, skill sets or part qualifications could be a better alternative to Certificate I vocational qualifications. However, the use of skill sets to meet short-term more narrowly-focused skills needs should not detract from the value of full qualifications for employers and individuals. The AQF should provide guidance on these issues and clearly differentiate between the different purposes of skill sets (i.e. immediate, role specific) and full qualifications (i.e. longer-term, transferable).

4.2.8 Volume of learning

Volume of learning is a contested, complex and important issue to be addressed in the review of the AQF. There is broad agreement among all stakeholders on the need for reform of the concept of volume of learning as represented in the current AQF.

It is obvious that the approach to volume of learning taken in the current AQF is out-dated, out of step with global practice and creating significant difficulties for providers, regulators and those at the interface of international mobility. It is essential that the review revisits and revises the concept to better fit current needs.

The current definition of volume of learning in the AQF is itself an excellent example of the linguistic and conceptual complexity that respondents have identified as problematic.

The volume of learning is a dimension of the complexity of a qualification. It is used with the level criteria and qualification type descriptor to determine the depth and breadth of the learning outcomes of a qualification. The volume of learning identifies the notional duration of all activities required for the achievement of the learning outcomes specified for a particular AQF qualification type. It is expressed in equivalent full-time years.

The range of comments provided by stakeholders and summarised below indicates the broad range of issues that will need to be considered. Providers complain that the volume of learning statements in the AQF are expressed in terms of months and calendar years (increasingly irrelevant in modern education) and lack specificity.

Many institutions now deliver courses based on trimester or term study periods that vary considerably in length from one institution to the next. It is difficult to judge whether a course meets AQF volume of learning when it is delivered in a 'non-traditional' format that is not delivered using two semesters per year. Even where semesters are used there is no standard length.

The AQF needs a clearer, more relevant definition of volume of learning. The concept of notional hours could be replaced by the concept of the average amount of time a learner requires for achieving the learning outcome as represented in credit values where the relationship to time, while still based on, say, 1 credit as 10 notional learning hours, is more flexible and can be easily decoupled from a number of years or semesters. This aligns with international practice. Credit values are also more easily attached to micro-credentials and could support a national credit transfer system.

One university noted that

Programs may change considerably especially as partnerships with industries and employers develop, and work integrated learning increases the quantum of hours in programs.

There will be considerable change to delivery mode, duration of subjects and courses. The traditional notion of the volume of learning quantified as a standard semester (of 10 weeks) is already under pressure as is the number of semesters per year. An approach like the quantum of hours used in the European Credit Transfer System may be a more resilient and transportable measure of time and effort required for subjects and programs going into the future. The AQF could usefully review this.

Another pointed to three main ways in which volume of learning can be a problematic concept:

in an outcomes-based educational framework: as per the HE Standards Framework, graduates must demonstrate the outcomes of an award, regardless of their starting point, or how long it took them to get there

digital delivery is increasingly the mode of delivery, where students can learn at their pace and place and more autonomously. Providers are moving from semesters, to trimesters, to multiple intakes per year - requiring evidence of 'volume' in "years" is no longer fit for purpose.

universities operate in a global market, and so the question is whether the framework is appropriate in comparison with other international frameworks: e.g. if a Masters degree is typically one year in the United Kingdom, but 1.5 to 2 years in Australia, that is a problem for international markets.

Another university highlighted the fact that the volume of learning requirements tend to steer providers towards traditional approaches to course delivery that detract from the intent to support individuals to progress through education, to gain recognition for prior learning and experience and to move easily between study and work.

The 2017 ASQA report⁴⁹ into unduly short training points to the existence of many different definitions and measures of duration currently in use contributing to the regulatory burden for RTOs and diminished transparency for consumers. The ASQA review identified significant variations in the volume of learning across providers for training products at the same level.

Most stakeholders who commented on volume of learning raised concerns that the AQF should not be seen as a 'time served' model and that the demonstration of competence should be central to the achievement of qualifications. From both a philosophical and operational point of view, there is friction between the spirit of competency-based training and the concept of volume of learning. Nominal hours create difficulties for some programs which are reliant upon assessing the competence of the learner.

⁴⁹ ASQA June 2017, A review of issues relating to unduly short training www.asqa.gov.au/news-publications/media/asqa-releases-findings-national-strategic-review-course-duration

Lack of clarity around volume and duration continue as issues with the current ASQA review of unduly short training commenting that:

*...for the most part, training packages include little information on the issue of volume of learning or course duration. As the AQF range applies to qualifications rather than units of competency, there is no guidance at all provided to developers, RTOs, learners or regulators about the expected volume of learning for each unit of competency.*⁵⁰

Given the recent concerns about unduly short course delivery in the VET sector, and proposals to mandate minimum hours in some circumstances, there is also concern about the relevance of the Volume of Learning specified for some AQF levels. It has been emphasised for some years in the tertiary education sector that in a world of increasing diversity of student cohorts, pedagogy and delivery technologies, the feasibility of mandating learning volumes, however described, is increasingly problematic. The focus must be on demonstrating achievement of learning outcomes and competency.

Lack of clarity around volume of learning can have serious consequences:

- Several respondents noted that the competitive market can drive a tendency to undercut competitors on price and the course hours, resulting in negative impacts on quality, reputation and student outcomes.
- The Australian Bureau of Statistics notes that greater consistency in the volume of learning/notional duration of the various qualifications would make it easier to delineate between occupations on the ANZ Standard Classification of Occupations for the purposes of reporting.
- Some providers note that changes to the volume of learning could have implications for funding if it is linked to delivery hours and payments.
- Some confusion for training providers and lecturers in the VET sector is noted because it is unclear how the volume of learning concept aligns with the 'amount of training' specified in the Standards for RTOs 2015, or with nominal hours used to inform funding. TAFE colleges advised that the volume of learning definition does not take into account their funding models. One college indicated changes may cause industrial relations issues as the 'years' specified in the volume of learning are used by lecturers to negotiate full time contracts.

The ASQA report and other regulators note that significant variations exist among providers on the duration of the same qualification and the duration of different qualifications at the same AQF level. These variations are not limited to training providers, but also training package developers when aligning qualifications to the AQF. The impacts are felt by funding bodies making subsidy payments to preferred training providers; training providers required to meet the Standards for RTOs; and students selecting courses.

⁵⁰ Australian Skills Qualifications Authority, A review of issues relating to unduly short training, June 2017, p.44. https://www.asqa.gov.au/sites/g/files/net3521/f/strategic_review_report_2017_course_duration.pdf

A member of the training package quality assurance panel commented that the standardised volume of learning across each qualification level is often not reflective of the amount of content within Training Package qualifications.

4.2.9 Implementation issues

The review of the AQF needs to consider implementation issues. Even with a good framework, supporting tools and implementation strategies are needed to make it work well. For example, international comparisons and some local commentators suggest that there could be more effective promotion and information dissemination about the AQF and how it should be used, particularly as there is anecdotal but consistent indications that some trainers do not know how to deliver and assess different levels of qualifications.

4.3 STAKEHOLDERS' COMMENTS ON BENEFITS OF THE AQF

In general, the AQF is seen as a transparent benchmark for qualifications in a context where professional roles and careers are increasingly fluid. It assists with international comparability and is used in this context for a variety of different objectives, all of which increase mobility of workers and professionals between institutions, sectors and countries.

4.3.1 International benefits

Stakeholders observed the following benefits of the AQF from an international perspective:

- The AQF is a long-standing and highly-respected national qualifications framework internationally and is used as a platform for government-to-government engagement, including bilateral and multilateral engagement and capacity building, thus supporting the success of the Australian international education sector.
- The AQF shows a clear progression of qualifications and expectations of various qualifications and the levels which is a useful resource for potential and existing international students.
- Partner governments have limited capacity to understand individual nuances of each international system, so the consistent branding/illustration of the AQF is helpful to ensure it remains easy to access.
- For qualifications recognition, the AQF provides a national, consistent and transparent framework to assess foreign qualifications at a practical level.
- For providers looking to deliver qualifications offshore and mapping international training, the AQF has provided a framework to understand other countries' level and depth of knowledge.

4.3.2 National benefits

It is generally recognised that the AQF has brought greater consistency and transparency to tertiary education and its interactions across sectors. At its best it allows students to build a learning and skills development pathway that can respond to their career and life aspirations. This is particularly important as digital and information technology revolutionise industries and jobs.

The ability to build a learning and skills development pathway through the AQF, however, is probably less fully realised than it could be outside the vocational education sector. There is a 'felt' but generally unacknowledged prejudice inherent in the hierarchical nature of the framework whereby it is believed by most that few students or advisers would be drawn to a pathway that progressed "backwards" from higher to lower levels on the AQF even when learning needs might suggest this to be a sensible approach. For example, this might encourage a tendency to inflate an educational program to a level 8 or 9 qualification in order to make it more attractive to a level 7 graduate.

The AQF levels can assist in defining the progression of education leading to a completed professional degree, and further, at the higher levels in some disciplines, the AQF parallels competencies required to be undertaken for specialist or higher-level training.

Often the levels and descriptors align with internationally benchmarked qualification standards. A working example of this is engineering qualifications, under the Washington, Sydney and Dublin Accords of the International Engineering Alliance.

At the course level the AQF potentially provides good guidance for developing and reviewing courses and can be a useful tool to inform course delivery and assessment. It has also influenced the development of institutional practices and policies for mapping knowledge and skills outcomes to qualifications. Users, however, often report difficulties and inconsistencies in interpreting levels and qualifications descriptors.

In general, the VET sector views the AQF as fit for purpose but considers that it requires further consideration in regard to volume of learning. Some users in the vocational education sector report that the AQF has been helpful in determining the language, literacy and numeracy requirements for entry to a qualification and has provided a useful foundation for industry consultations. It can also provide a basis for articulation pathways between the VET and higher education sectors.

5 DETAILED COMMENTS ON THE CONTENT OF THE AQF

5.1 OVERVIEW

There is considerable feedback across regulators, providers, professions, industry and government agencies that the descriptors of levels and qualifications are not as effective as people would wish them to be. The 2018 review will need to focus on the language, presentation and underpinning concepts of the AQF to make it more easily understood and implemented.

As a document the AQF currently fails in one of its key objectives which is to clarify for the general public the options from which they may choose to achieve their learning and employment goals. This conclusion is inescapable given the considerable expressions of confusion among those whose job it is to design, deliver and quality assure educational programs.

There is a considerable degree of criticism of the ambiguity of descriptors in general. An analysis offered by one university respondent provides an idea of the scope of the perceived problems.

- *Masters Degree specifies generic learning outcomes in four broad categories: fundamental skills; people skills; thinking skills; and personal skills. Where is 'fundamental skills' defined? What is the difference between personal skills and fundamental skills i.e. what would 'getting work done on time' fall under?*
- *There is some confusion between different levels within the descriptors. This was most noticeable in AQF Levels 4-6. For example, sometimes there is no difference between the levels:*
 - *Diploma – "Cognitive and communication skills to identify, analyse, synthesise and act on information from a range of sources."*
 - *Advanced Diploma – "Cognitive and communication skills to identify, analyse, synthesise and act on information from a range of sources"*
- *Sometimes the Diploma level seems higher than Advanced Diploma:*
 - *Diploma – "Cognitive, technical and communication skills to analyse, plan, design and evaluate approaches to unpredictable problems"*
 - *Advanced Diploma – "Cognitive and communication skills to transfer knowledge and skills to others and to demonstrate understanding of specialised knowledge with depth in some areas"*
- *But then the Advanced Diploma mentions the same skills in a different descriptor:*
 - *"wide-ranging specialised technical, creative or conceptual skills to express ideas and perspectives"*

- *It is sometimes difficult to work between two AQF levels, because elements are sometimes listed under different descriptors.*
 - *Diploma – Includes team work as part of initiative and judgment descriptor; but*
 - *Advanced Diploma – Includes team work as part of accountability descriptor (there is a separate item for initiative and judgment in Advanced Diploma)*
- *Some descriptors for AQF 4-6 seemed to require higher levels than AQF 7 and even AQF 8:*
 - *Advanced Diploma (AQF 5)- “across a broad range of technical or management functions with accountability for personal outputs and personal and team outcomes within broad parameters”*
 - *Bachelors (AQF 7) (and Honours AQF 8): “with responsibility and accountability for own learning and professional practice and in collaboration with others within broad parameters”*

Respondents provided detailed comments on each of the levels of the AQF which can be used as a guide to those aspects that require particular attention.

5.2 FOUNDATIONAL EDUCATION

Some stakeholders have suggested that there is scope for a new accredited qualification option within the AQF which recognises educational development and supports literacy, numeracy, digital fluency and language skills without achieving vocational outcomes. One tertiary provider suggested consideration of a general education stream of qualifications that would sit outside the Senior Secondary Certificate of Education and also outside the vocational outcomes of VET qualifications, but support the clear need for improvements in literacy, numeracy, digital skills and language development.

Universities in particular note the poor foundational skills in language, literacy and numeracy in students enrolled in level 7 degree studies and suggest that these students could have been exposed to foundational studies at lower AQF levels during their school years or could have been directed towards VET certificates rather than academic studies in senior high school.

Since the Training Package Policy is implemented consistently within VET according to ASQA accreditation policy there is no avenue in VET for general education programs that do not have a specific vocational outcome to be created at the lower levels of the current AQF.

5.3 SENIOR SECONDARY CERTIFICATE OF EDUCATION

5.3.1 The place of the SSCE in the AQF

The Senior Secondary Certificate of Education (SSCE) is highlighted in the centre of the AQF schematic presumably reflecting the need for all students to complete year 12. To some respondents the year 12 SSCE signals an assumed trajectory into AQF 7 University or a 'second best' AQF 5/6 pathway. One respondent pointed out that the graphic used throughout the documentation, with Secondary Education in the centre of the circle, could suggest that this is the entry point to every other level in the framework, but this is clearly not the case.

Several respondents have highlighted the need for greater clarity surrounding secondary school year levels 9-12 and their relationship to AQF levels 1 to 5. For example, does the AQF permit students to move from year 9 or 10 into a VET qualification at level 1 or 2 or from year 12 into level 3? Arguably, a Year 10 student could complete their final two years by completing an AQF Diploma (level 5 or 6).

Some universities noted that the AQF should be clearer in alignment of the Senior Secondary Certificate of Education with AQF levels. In practice, for the purposes of admission to a Bachelor Degree, the SSCE is commonly seen as equivalent to a Certificate IV qualification. The Comparative Analysis of the Australian Qualifications Framework and the European Qualifications Framework for Lifelong Learning: Joint Technical Report from 2016 (p.19)⁵¹ appears to suggest that this is the case, but this is unclear in the AQF. If one or more Certificate levels of study were aligned to the Senior Secondary Certificate higher education providers would have a better understanding of the potential level of preparation for higher education studies gained through VET certificate level study.

Users of Australian Bureau of Statistics education data often require a single measure of overall level of highest educational attainment. The ambiguity between the Senior Secondary Certificate of Education (and levels of completed schooling) and Certificate qualifications has led the ABS to produce a [decision table](#) to attempt to rank the level of highest educational attainment.

5.3.2 The Australian Curriculum and SCCE

The Australian Curriculum Assessment and Reporting Authority suggested in the information it provided that it may be timely to consider some alignment or complementarity of the skills/competencies/capabilities between the Australian Curriculum and the AQF at Level 1. The general capabilities identified as one of the

⁵¹ Comparative Analysis of the AQF and EQF for Lifelong Learning: Joint Technical Report 2016
https://internationaleducation.gov.au/News/Latest-News/Documents/ED16-0165%20-%20693040%20-%20Joint%20Technical%20Report_ACC.pdf

dimensions of the Australian Curriculum are defined in terms relevant to 21st century skills for further study or work⁵².

Various state and territory schools authorities have suggested that:

- Further work is needed to align the SSCE with the AQF. Because the SSCE can address several levels of the AQF concurrently depending upon the courses chosen by the student placement of SSCE at a single level outside the AQF creates complexities and may impede the international standing or competitiveness of Australian SSCEs. The International Baccalaureate should also be considered given its increasing popularity in Australia.
- A review of all AQF level purpose, knowledge and skill descriptors may be required to identify how these descriptors align to other nationally recognised frameworks such as the Australian Core Skills Framework (ACSF). The ACSF provides guidance to a number of Boards of Study nationally on matters such as literacy and numeracy skills required to complete a SSCE. For example, the Certificate I qualification purpose stated in the AQF reflects the course aims of foundation courses offered in some Australian states that are aligned with the minimum literacy and numeracy standard which is set at Level 3 of the ACSF.

5.3.3 VET in Schools

Vocational education delivered to secondary students makes up a significant proportion of total VET activity across the nation. NCVET data shows that in 2016, 243 300 students undertook VET in Schools. Since States and Territories have different approaches to including VET within a Senior School Certificate of Education and there are significant numbers of students involved there could be an argument that VET in the school sector should be specifically reviewed with the AQF.

For example, in NSW the NSW Educational Standards Authority (NESA) offers VET at the Certificate I to Certificate III level with some qualifications contributing towards the Australian Tertiary Admissions Rank. In some states it is becoming more common for students to undertake Certificate level III while in Year 11 or 12 but some also undertake Certificate level IV and Diploma studies. Some respondents indicate that the descriptors/criteria for these levels are sometimes difficult to “match” with the SSCE subjects in some states.

This lack of clarity for schools is compounded by the varying interpretations of levels that appear to be taken by Service Skills Organisations⁵³. Respondents from the schools sector have reported that not all qualifications at the same AQF level are in fact the same. Some Certificate II qualifications appear to be more akin to Certificate I qualifications. The question was asked “how do the Service Skills Organisations and the Australian Industry Skills Committee (AISC) ensure that qualifications are set at the right level?”

⁵² <https://www.australiancurriculum.edu.au/f-10-curriculum/general-capabilities/>

⁵³ <https://www.aisc.net.au/content/skills-service-organisations>

5.4 AQF LEVELS 1 TO 4

The VET sector cites continuing issues about equivalency or levels of difficulty between qualifications at same level, especially for Certificate III, and linkage to depth of training (trades vs non-trade VET qualifications) and duration of training.

It has been suggested that the continued relevance of the AQF level 1 qualification should be reviewed. As the nature of work becomes more complex and non-routine, the level of training required to equip individuals with the requisite skills for the workplace heightens. This trend can be seen through the relative decline in lower level (AQF 1-2) qualifications. Those working at the interface with employers suggest that the value of AQF 1 qualifications, even as a preparatory/pathway qualification is decreasing. AQF 1 qualifications may no longer meet the purpose of equipping students with 'basic functional knowledge and skills to undertake work, further learning and community involvement'. It was suggested that purpose of AQF 1 qualifications should not include the 'skills to undertake work'.

VET providers identified a number of significant challenges in the current system:

- Reconciling the disconnect in volume of learning, specifically at the Certificate III level between trade and non-trade qualifications, but also between Certificate III trade qualifications and most other AQF VET qualifications. This issue is believed to stem from two sources:
 - A lack of clarity between volume of learning and nominal hours
 - An artificial pegging of trade qualifications to the Certificate III level.
- The lack of a mechanism that ensures the consistent matching of course competencies, training packages and accredited courses to the AQF. This mapping is currently done on an ad hoc basis at the sector level, which means that, for example, two Certificate III qualifications in different (occupational) sectors could require competencies at different AQF levels.
- This becomes more problematic when two different sectors, VET and higher education, offer qualifications at the same AQF level.
- Some Certificate IIIs are too long because they are “filled out” to meet the needs of the levels descriptors. There needs to be more thought given to duration versus complexity.
- There appears to be some “qualification creep” where Certificate III has become the entry-level qualification into employment within some industry areas.
- The level summaries, learning outcomes criteria and qualification type learning outcome descriptors fail to adequately differentiate between trade qualifications and non-trade qualifications, particularly at the certificate III and IV levels. Graduates of a business certificate III may meet the descriptions as provided while trade graduates will have sophisticated skills, knowledge decision making and learning application more closely aligned to level 5.

The inconsistency of the AQF course classifications was also reported as a difficulty for the sector. Contrasts were made between a student who completed a Certificate III in one year compared to a tradesperson who took three years to complete their Certificate III qualification. Comparisons were also drawn between qualifications in different industries but at the same AQF level, such as Certificate III in Retail and the Certificate III in Electrotechnology Electrician. In the examples provided, while the complexity of the qualification, depth of knowledge, training outcome and duration are not comparable, they are determined to be equivalent AQF levels.

5.5 AQF LEVELS 5 -7

Providers experience a significant problem with these levels.

A key issue is the difference between Higher Education and Vocational Education and Training AQF level 5/6s. They are equivalent from an AQF perspective, yet there are differences in eligibility, funding, and the process for qualification development.

The following paragraphs summarise statements made by providers on this issue. In general, they raise concerns about ambiguities in having different qualifications on the same level, but also about differentiation of student support payments for the same qualification dependent upon its classification as “VET” or “HE”. While funding and support payments may sit outside the sphere of influence of the AQF they nevertheless potentially promote powerful distortions in the marketplace for qualifications which is a core concern for the AQF.

- AQF Level 6 provides for both Advanced Diploma and Associate Degree with an identical description of the expected outcomes. In practice both qualifications can be credited towards an undergraduate degree. It may be worth further consideration of these two qualifications, as to whether their distinct features can be identified and described. If there are no distinctive features then only one qualification at the AQF Level 6 may be required, which would streamline the framework at Level 6.
- With universities now delivering diplomas and with RTOs moving into higher education as dual sector providers, the lines of progression for these mid AQF level courses have become unclear. The existence of the same qualification in two sectors and whether this is beneficial to students or causes distortions in the market (especially in terms of different funding models, e.g. a course delivered in one sector receiving HELP support while the same course in another sector receives none) warrants consideration.
- Does the AQF adequately define a ‘sub-degree’? Diploma, Advanced Diploma and Associate degrees in both the vocational and higher education system are loosely understood to be sub-degree but this would benefit from clarification.
- At the Advanced Diploma (VET) and Associate Degree (higher education) levels providers identified major gaps in terms of knowledge, skill, and application of knowledge and skill between the two qualification types. This is particularly

problematic when designing RPL tools that enable permeability between the two sectors.

- Having the same description for dual sector awards such as Diploma, Advanced Diploma, Graduate Certificate and Graduate Diploma can cause confusion in terms of whether an award received by a graduate is a VET or higher education award. Consideration should be given to differentiating the descriptions for these awards as delivered in the higher education and the VET sectors, thereby highlighting the unique attributes of each sector. Consideration should be given also to whether an Advanced Diploma is needed in the higher education sector where an Associate Degree is in place.
- Levels 5 and 6 (Diploma; Advanced Diploma/Associate Degree) don't get enough attention – there is a “gap” between ‘blue collar’ (levels 2, 3, 4) and higher education (7, 8, 9, 10). Levels 5 and 6 are “mired” between traditional VET and HE.
- Suggestions have been made that these issues might be resolved by clarifying the volume of learning, the level of skill acquisition and the pathways that each qualification offers a student.
 - For example, an Advanced Diploma in the VET system would involve 32-36 weeks of contact whereas an Associate Degree in the HE system can vary between 24 and 72 weeks of contact. Both are AQF 6.
 - The VET AQF 5/6 qualifications provide a student with a high level of skill acquisition whereas the HE AQF 5/6 is arguably open to curriculum interpretation with no real reference to skills.
 - There is also a case for a better statement re pathways. Can an AQF HE Diploma allow for full credit into an AQF 7 Bachelors degree? How much credit should a VET AQF 5/6 provide for an AQF 7 Bachelors degree?
- The distinction between diplomas (AQF 5) that are offered by VET and higher education providers is problematic. The nomenclature of ‘diploma’ is confusing given that VET diplomas tend to be a higher-level area specific qualification, whereas diplomas offered through higher education providers tend to be broader generic qualifications with a focus of enabling and foundational content for university study.
- Associate diplomas are being increasingly recognised by industry as a stand-alone qualification in new and emerging job roles. These are in areas where AQF 3 and 4 have traditionally been the qualification level and where the completion of an AQF 6 level qualification is considered to be a benchmark for moving into management level roles.
- AQF level 6 associate degrees are an increasingly relevant and useful qualification in bridging the transition from vocational education and training to higher education, especially where the traditional entry qualification is at the AQF 3 and 4 level. Associate degrees allow courses to be designed that encompass an extension of area specific knowledge to a higher level in conjunction with university

foundation/enabling content, often in areas where there is not yet a full AQF7 bachelor program available (or required). This then allows students to gain entry to a variety of related bachelor degree programs with advanced standing, e.g. an associate degree in aged care can provide entry into bachelor degrees in nursing, allied health and other related areas.

- The nomenclature “associate degree” is not readily understandable or recognised among industry, employers and the broader community.
- Of considerable concern to the professions is the growing demand for PG articulation and career change and they perceive a “gap” in the middle of the AQF. The gap emerges between the skills provided by the qualifications and the skills to practice. The bigger context is the lack of a mechanism beyond the AQF leading to registration and professional competence. These professions seek a way to ensure validation of practice as well as qualifications – validation of practice falls outside the remit of the AQF as currently defined and in the Australian context usually means registration of practitioners.

5.6 AQF LEVELS 8 TO 9

Most concern is around Level 8 where most of the professional qualifications fall. One university noted that the range of guidance notes around AQF levels 8 and 9 is evidence that those levels have presented “considerable challenges” and that while volume of learning at those levels is in line with accepted practice *“[d]escriptive words and phrases used for increasingly higher AQF levels of knowledge, skills, and application of skills, are much less clear and the differences in performance would be unlikely to be consistently interpreted.”*

Other comments are cited below:

- The existence of higher AQF level courses (e.g. graduate certificates and graduate diplomas) in both Higher Education and VET poses ongoing difficulties reported by a number of providers. While these courses are supposedly subject to the same AQF descriptors and exist at the same AQF level, the degree of difficulty in gaining approval for such a course in each of the sectors is reported to be extremely different. ASQA and TEQSA are completely different in approach.
- Providers report difficulties in explaining to a potential student the difference between undertaking a postgraduate course at a higher education provider as opposed to a registered training organisation. The delivery style, standards frameworks and scholarship that inform the course are different. Higher education requirements make courses much more expensive to run yet the higher education award is supposedly “equivalent” to the VET award. This can also be difficult to explain when RTOs offer their courses relatively cheaply and over very short timeframes.
- There is opportunity to simplify the array of qualifications included at Level 8 which include a mix of qualifications types that serve a range of different purposes, e.g. to enable students to gain a professional advantage or to support a

career move, to provide a pathway to Masters qualifications (including potentially for students without a Bachelor Degree) and/or to provide a pathway to higher degrees by research.

- A review of how all post-graduate courses, particularly masters' degrees, are placed within AQF levels 7, 8 and 9 would be beneficial. Areas of particular concern include:
 - Inconsistency of duration - master degrees vary from 18 months to beyond two years full time, depending on the discipline and institution.
 - The level of different master degree structures is not recognised - the academic rigor, workload and application required can differ considerably depending on whether the course is coursework, research or mixed.
 - Universities offering masters degrees as an initial qualification – it is questionable whether such courses should be at a postgraduate level, and if they are, whether a new postgraduate nomenclature for AQF 7 should be considered.
- A comparison and analysis of the purpose, differences and relationships between Graduate Certificate and Graduate Diploma outcomes in the Higher Education and VET sectors is needed. Outcomes of the analysis could be used to either support the retention or removal of one of the qualifications. Similarly, there is a need to compare the Graduate Certificate and Graduate Diploma qualifications to the Bachelor (Honours) Degree.
- Level 8 Grad Cert/Grad Diploma/ Honours sit at the same level on the AQF yet the nature of each of these qualifications and their respective pathways are quite different. This can sometimes create difficulties when comparing overseas qualifications to the AQF as applicants may find themselves 'short-changed' with an AQF Level 8 comparability outcome (rather than Level 9) upon completion of a four or five-year first cycle degree which requires intensive study and research and the submission of a thesis.
- There needs to be greater clarity around the integrated 4 year Honours degree, perhaps an "integrated descriptor" for Level 8.
- Several employers and professional groups have noted that the current Level 8 descriptor does not work for the Graduate Certificate – it is said to be too easy to get RPL from a Level 5 Diploma into a Level 8 Graduate Certificate. There is no need to have Level 7 qualifications to get into Level 8 – it is possible to do it with only 5 years work experience. People are able to "leapfrog" from Certificate IV to Level 8 Graduate Certificate without ever doing an undergraduate degree – ie can go from 'tradie' to professional and, for example, supervise major building projects largely through RPL and a 6 months Graduate Certificate. Many trades/professions, especially in occupations like building are not registered so there is no check on skill levels beyond the AQF descriptors. There is no accreditation of individuals and reliance only on the academic qualifications is unsatisfactory.

- The Graduate Certificate and Graduate Diploma descriptors only talk about “volume of learning” and make no mention of entry qualifications or necessary base starting points. The learning outcomes are the same even though the volume of learning is double for the Graduate Diploma which suggests very different learning outcomes. Students argue about why they have to pay twice as much to get a Graduate Diploma if the learning outcomes are the same.
- There is a concern that some RTOs and HEPs are making the RPL judgements into Level 8 qualifications without the input of the professions. There is a perverse incentive for some providers to maximise RPL to encourage enrolments.
- Several professional representatives reported that various states change their funding decisions on Certificate III, Certificate IV and Graduate Diplomas annually and this causes problems for the business models of some RTOs.
- The AQF allows only one model for a Masters degree which is advanced study following a Bachelors degree. However, some providers are enrolling students in integrated Bachelors/Masters degrees straight from matriculation. Integrated Masters are not covered in the AQF. This is symptomatic of a bigger issue and that is the possibility of “bundling AQF levels in different delivery pathways” (RTO and HEP). It might be possible to express the variety of pathways more explicitly. Blurring the lines offers flexibility but also carries risks which may be greater in some professions than others.
- Professional bodies may remain more interested in program content, skills development and duration (or scale) than AQF level. AQF levels 7, 8 and 9 appear to be used interchangeably in some professions, with professional entry set at bachelor program level, and post-graduate programs increasingly designed as articulation pathways for those with non-cognate or foreign qualifications. In this sense, the post-graduate programs are not always considered superior to undergraduate programs and may not be linked to differentiated job levels. This seems to have occurred by evolution rather than by design and may be a source of confusion.
- Some professional bodies consider that the 2018 AQF review should consider making the Bachelor Honours Degree (integrated) much more explicit. It is in the interests of students, employers and professions that the principal education pathways are clearly represented in the AQF structure. Other professions that favour, or already have, 4-year degrees as their basic qualification would also benefit.

5.7 AQF LEVELS 9-10

Many respondents from outside the higher education sector drew attention to what they viewed as an inherent prejudice that drives the AQF. That prejudice privileges theoretical and academic knowledge over technical expertise and implies that knowledge and the generation of new knowledge is only validly available in higher education. One

respondent asked the question “how do you classify the development of a new type of brick?”

The current division of technical and higher education into “silos” with rickety bridges between them is premised as much on cultural norms and social values as it is on rational explanation. The movement of many professions (including medicine and engineering) from technical colleges into universities over the last 150 years is evidence of that as is the evolution of the purpose of universities themselves. Evolution is ongoing with the arrival of “teaching-only” higher education providers. Evidence is also found in some qualifications frameworks from Europe where it is possible to achieve higher levels of qualification via a technical route as well as via an academic route. In these cases the highest levels of knowledge and skills attainment are recognised with qualifications that are distinguished by their titles and which carry “parity of esteem”.

While it has not been suggested that the AQF adopt this approach it is an important backdrop to the review of the higher levels of the framework. Many of the difficulties that have been reported in the upper levels of the AQF have arisen from adherence to a traditional set of assumptions e.g. that Honours must be a prelude to a research degree, or that a Masters degree must adhere to a pattern that doesn't quite fit for a professional who needs training in different skills, not necessarily advanced ones, or that a Doctorate must contain a minimum of 2 years of research which is rather narrowly interpreted. In many cases these fixed definitions have either been worked around or have given rise to changes in the structure of degrees that are not necessarily beneficial or aligned with international practice.

A general comment about the risks of pressure towards conformity and homogeneity at this level was offered by one university:

With the capping of CSP places there will be increased competition especially in the postgraduate coursework segment of the market and, consequently, an increased emphasis on the diversity and distinctiveness of the academic program portfolio each university offers. This, along with the emergence of new and agile players in the sector, will place pressure on the AQF design framework of postgraduate programs and the current homogeneity these programs have across the sector.

Other suggestions are summarised below:

- The provision of a more precise explanation of how duration of Masters courses can be shortened through prior cognate undergraduate study would ensure more consistent approaches in the higher education sector where currently there is some variation in approach. The current lack of direction in this regard potentially raises issues of quality in terms of ensuring that masters courses comply with requirements for a preponderance of study being at level 9 on the AQF.
- A review of the revised (2014) requirements at Level 10 for Doctoral degrees has been described by at least one profession as essential. While Level 10 allows for both the research only (PhD) type of program as well as the former ‘Professional Doctorate’ type of program, the current description of Level 10 states that

“Research in the program of learning will be typically for at least two years of the qualification” (AQF Specification for the Doctoral degree, p.65). This requirement potentially limits the coursework component of a three year doctoral program and hence does not allow for professional Doctorates to deliver a sufficient volume of professional learning (coursework and practicum) required for skilled practice in a specialised area upon graduation. The implications are that graduates of these professional doctorates may not have the volume of practical knowledge and training that equivalent international jurisdictions demand for specialist level work, and graduates from these programs may not be able to register or become licenced to practice. The research component of a professional Doctorate degree needs to remain substantial, and make a significant and original contribution to knowledge in the context of professional practice, but research cannot define this degree.

- Reportedly this anomaly has been circumvented in some professions with several professional degrees offered by several universities successfully challenging the use of the title “doctor” only to signify a graduate of a predominantly research degree and offering level 9 qualifications as ‘doctorates’ e.g. the University of Melbourne Doctor of Medicine (MD) degree which is a “professional entry masters level program ...[that] is a four year full-time course ... of 400 credit points”⁵⁴.

These unintended consequences (and potentially others not reported to this contextual research) imply the need for clarification of the distinction between “levels” and “qualifications/titles”.

The ABS has pointed to statistical reporting difficulties arising from these anomalies⁵⁵:

Masters Degree (extended) qualifications and the use of the title “Doctor of ...” for certain qualifications at this level causes some issues with correctly assigning the level of education. In cases where respondents simply use a description of “doctor” for their level of attainment, it is difficult to determine whether the level is actually a Doctoral Degree (e.g. a Doctor of Philosophy), a Masters Degree (extended) or merely an occupation description which does not accurately describe the underlying qualification.

In a survey environment, it is not viable to output information for the different types of Masters Degree (i.e. “coursework”, “research” or “extended”) or Doctoral Degree (i.e. “research” or “professional”) as this level of detail is seldom provided by respondents.

⁵⁴ <https://mdhs-study.unimelb.edu.au/degrees/doctor-of-medicine/overview>

⁵⁵ ABS personal communication

APPENDIX 1: AUSTRALIAN GOVERNMENT LEGISLATION AND THE AQF

S. No.	Name	Type	Brief Description	AQF use
1.	A New Tax System (Goods and Services Tax) (Exempt Taxes, Fees and Charges) Determination 2011 (No.1) https://www.legislation.gov.au/Details/F2010L03352	Determination	The purpose of the A New Tax System (Goods and Services Tax) (Exempt Taxes, Fees and Charges) Determination 2011 (no. 1) [Determination 2011 (No. 1) is to list those taxes, fees and charges that are excluded from the scope of the goods and services tax (GST) base.	Under Part 9 (4.2), in Northern Territory, the fees for accreditation/re-accreditation of courses under Australian qualifications framework is tax exempt.
2.	Australian Education Regulation 2013 https://www.legislation.gov.au/Details/F2018C00044	Regulations	This is a compilation of the <i>Australian Education Regulation 2013</i> that shows the text of the law as amended (taking into account amendments up to Australian Education Amendment (2017 Measures No. 3) Regulations 2017) and in force on 22 September	Under the Division 3 (Ongoing policy requirements for approved authorities) and Subdivision F (Information for the purposes of a national program to collect data on schools and school education), the performance measures for students at a school must be provided. For these purposes, the performance measure for vocational education and training is the percentage of selected students aged 15 to 19 years who successfully completed at least one unit of competency as part of a VET qualification at the AQF Certificate II or above during the reporting period.

S. No.	Name	Type	Brief Description	AQF use
			2017 (the compilation date).	
3.	Australian Research Council Act 2001 – Future Fellowships – Funding Rules for funding commencing in 2014 https://www.legislation.gov.au/Details/F2013L01594	Rules	The instrument to offer up to 150 four-year fellowships to mid-career researchers.	Under section 3, <i>PhD</i> is defined as a qualification that meets the level 10 criteria of the AQF Second Edition January 2013 .
4.	Australian Research Council Funding Rules for schemes under the Discovery Program for the years 2014 and 2015 https://www.legislation.gov.au/Details/F2014L00193	Rules	This instrument relates to schemes funded under the Discovery Program of the ARC's National Competitive Grants Program. The Discovery Program supports the growth of Australia's research and innovation capacity, which generates new knowledge resulting in the development of new technologies, products and ideas, the creation of jobs, economic growth and an	Part A(A3) defines <i>PhD</i> as a qualification that meets the level 10 criteria of the AQF Second Edition January 2013 .

S. No.	Name	Type	Brief Description	AQF use
			enhanced quality of life in Australia.	
5.	Australian Research Council Funding Rules for schemes under the Discovery Program 2015 – Future Fellowships https://www.legislation.gov.au/Details/F2015L00978	Rules	This instrument relates to the Future Fellowships for funding commencing in 2015 funded under the Discovery Program of the ARC's National Competitive Grants Program. The Discovery Program supports the growth of Australia's research and innovation capacity, which generates new knowledge resulting in the development of new technologies, products and ideas, the creation of jobs, economic growth and an enhanced quality of life in Australia.	Part A(A3) defines <i>PhD</i> as a qualification that meets the level 10 criteria of the AQF Second Edition January 2013 . Under Part B(B6.3.3), eligibility requirements for candidates for Future Fellowship states that if the candidate holds a research higher degree other than PhD, it is Administering Organisation's responsibility to certify that the candidate's qualification meets level 10 criteria of the AQF Second Edition January 2013 .
6.	Australian Research Council Funding Rules for schemes under the Discovery	Rules	This instrument supports the growth of Australia's research and innovation capacity, which generates new knowledge resulting in the development of new	Part A(A3) defines PhD as a qualification that meets the level 10 criteria of the AQF Second Edition January 2013 . Under Part D(D7.3.3), eligibility requirements for candidates for Discovery Early Career Researcher Award (DECRA) states that if

S. No.	Name	Type	Brief Description	AQF use
	Programme (2015 edition) https://www.legislation.gov.au/Details/F2015L01468		technologies, products and ideas, the creation of jobs, economic growth and an enhanced quality of life in Australia.	the candidate holds a research higher degree other than PhD, it is Administering Organisation's responsibility to certify that the candidate's qualification meets level 10 criteria of the AQF Second Edition January 2013 .
7.	Australian Research Council Funding Rules for schemes under the Discovery Program for the years 2015 and 2016 https://www.legislation.gov.au/Details/F2014L01525	Rules	These rules relate to schemes funded under the Discovery Program of the ARC's National Competitive Grants Program, and apply to Australian Laureate Fellowships for funding commencing in 2015, Discovery Projects for funding commencing in 2016, Discovery Early Career Researcher Award for funding commencing in 2016, and Discovery Indigenous for funding commencing in 2016.	Part A (A3) defines PhD as a qualification that meets the level 10 criteria of the AQF Second Edition January 2013 . Under Part D(D7.3.3), eligibility requirements for candidates for Discovery Early Career Researcher Award (DECRA) states that if the candidate holds a research higher degree other than PhD, it is Administering Organisation's responsibility to certify that the candidate's qualification meets level 10 criteria of the AQF Second Edition January 2013 .

S. No.	Name	Type	Brief Description	AQF use
8.	<p>a. Australian Research Council Funding Rules for schemes under the Discovery Programme (2016 edition) https://www.legislation.gov.au/Details/F2016L01611</p> <p>b. Australian Research Council Funding Rules for schemes under the Discovery Program (2017 edition) https://www.legislation.gov.au/Details/F2017L01407</p>	Rules	<p>These instruments relate to the Discovery Programme (2016 and 2017 editions) which is under the Australian Research Council's National Competitive Grants Programme. The Discovery Programme supports the growth of Australia's research and innovation capacity, which generates new knowledge resulting in the development of new technologies, products and ideas, the creation of jobs, economic growth and an enhanced quality of life in Australia.</p>	<p>Part A(A3) defines PhD as a qualification that meets the level 10 criteria of the AQF Second Edition January 2013.</p> <p>Under Part C(C9.3.2) (2016 edition) and Part C(C6.2.6) (2017 edition), eligibility requirements for candidates for Future Fellowship and under Part D(D9.1.2) (2016 edition) and Part D(D5.2.5) (2017 edition), eligibility requirements for candidates for <i>Discovery Early Career Researcher Award</i> (DECRA) states that if the candidate holds a research higher degree other than PhD, it is Administering Organisation's responsibility to certify that the candidate's qualification meets level 10 criteria of the AQF Second Edition January 2013.</p>
9.	<p>a. Australian Research Council Funding Rules for schemes under the Linkage Program for the years 2014-2016 Industrial</p>			

S. No.	Name	Type	Brief Description	AQF use
	Transformation Research Hubs, Industrial Transformation Training Centres, Linkage Projects and Linkage Infrastructure, Equipment and Facilities https://www.legislation.gov.au/Details/F2014L01323	Rules	These instruments relate to schemes funded under the Linkage Program of the National Competitive Grants Program.	Part A(A3) defines <i>PhD</i> as a qualification that meets the level 10 criteria of the AQF Second Edition January 2013 .
b.	Australian Research Council Funding Rules for schemes under the Linkage Programme (2015 edition) https://www.legislation.gov.au/Details/F2015L01467			
c.	Australian Research Council Funding Rules for schemes			

S. No.	Name	Type	Brief Description	AQF use
	<p>under the Linkage Programme (2016 edition) https://www.legislation.gov.au/Details/F2016L01610</p>			
d.	<p>Australian Research Council Funding Rules for schemes under the Linkage Program (2017 edition) https://www.legislation.gov.au/Details/F2017L00594</p>			
e.	<p>Australian Research Council Funding Rules for schemes under the Linkage Program (2017 edition) (14/08/2017)</p>	Rules	<p>These instruments relate to schemes funded under the Linkage Program of the National Competitive Grants Program.</p>	<p>Part A(A3) defines PhD as a qualification that meets the level 10 criteria of the AQF Second Edition January 2013.</p>

S. No.	Name	Type	Brief Description	AQF use
	https://www.legislation.gov.au/Details/F2017L01137			
10.	Australian Skills Quality Authority Instrument Fixing Fees No.1 of 2013 https://www.legislation.gov.au/Details/F2017C00664	Legislative Instrument	No. 1 of 2013 Determinations/Other as amended, taking into account amendments up to Australian Skills Quality Authority Instrument Fixing Fees Amendment (Annual Registration Fees) Determination 2017	Part1(6) defines <i>Training Package</i> as a nationally endorsed, integrated set of competency standards, assessment requirements, Australian Qualifications Framework qualifications , and credit arrangements for a specific industry, industry sector or enterprise.
11.	Civil Aviation Order 104.0 (Certificates of approval – application, grant and conditions) https://www.legislation.gov.au/Details/F2015C00471	Order	Orders/Civil Aviation as amended, taking into account amendments up to Civil Aviation Order 104.0 Amendment Instrument 2015 (No. 2) This Order applies to persons seeking or holding a certificate of approval of the kind referred to in regulation 30 of the <i>Civil Aviation Regulations 1988</i> .	Under subsection 10(10.4), for a wood and fabric employee to get authorised by COA holder, it is necessary to successfully complete training and assessment which must be in accordance with the COA holder’s Quality Control Manual as approved in writing by CASA (Civil Aviation Safety Authority) for training and assessment in the maintenance of wooden aircraft and wooden aircraft components, or maintenance on, or the replacement and repair, of aircraft fabric surfaces and of a standard equivalent to whichever of the following Australian Qualifications Framework units is applicable: (a) MEA 357A (inspect, test and repair fabric surfaces); (b) MEA 358A (re-cover aircraft fabric surfaces); (c) MEA 359A (inspect and repair aircraft wooden structures).

S. No.	Name	Type	Brief Description	AQF use
				<i>COA holder</i> means a person who holds a certificate of approval under regulation 30 of CAR 1988 for maintenance of aircraft, aircraft components or aircraft materials.
12.	Civil Aviation Safety Regulations 1998 https://www.legislation.gov.au/Details/F2017C00742	Regulations <u>AQF mentioned in:</u> Volume 2 Volume 4 Volume 5	SR 1998 No. 237 Regulations as amended, taking into account amendments up to Civil Aviation Safety Amendment (Part 90) Regulations 2017	<p>In Volume 2, under part 61(61.010), the <i>Certificate IV in Training and Assessment</i> is defined as the Certificate IV in Training and Assessment issued by a registered training organisation under the Australian Qualifications framework.</p> <p>In Volume 4, section 143.010 defines Australian Qualifications Framework as the framework set out in a document called 'Australian Qualifications Framework Implementation Handbook' published by the AQF Advisory Board in 1998.</p> <p>Under section 143.055, in requirements to be complied by Air Traffic Services (ATS) training providers, Australian Qualifications Framework is mentioned as one of the standards for the training relating to air traffic services.</p> <p>In Part 3 of Volume 5, <i>Unit of Competency</i> is also defined as a unit of the Australian Qualifications Framework Aeroskills Training Package, as in force from time to time.</p>
13.	Child Care Subsidy Minister's Rules 2017	Rules	This instrument prescribes permitted absences; key additional child care subsidy (ACCS) eligibility	Under subsection 13(7), Australian Qualifications Framework (Second Edition) level 2 (Certificate II) through to level 8 (up to Graduate Diploma) course of education or study are mentioned

S. No.	Name	Type	Brief Description	AQF use
	https://www.legislation.gov.au/Details/F2017L01464		requirements; recognised activities and circumstances in which an individual may receive a deemed activity test result for hours of subsidised care; and when a provider or a person related to a provider or service is a fit and proper person for approval purposes. The Minister's rules also set out additional conditions for continued approval, modifications of the primary Acts, and transitional rules.	<p>as one of the study requirements for individuals to become eligible for child care subsidy and additional child care subsidy.</p> <p>In subsection 13(12), the time limits for eligibility AQF is mentioned as follows:</p> <p>104 weeks for full-time basis and 208 weeks for part-time basis for courses at level 2 to level 6 and level 8 of AQF. 156 weeks for full-time basis and 312 weeks for part-time basis courses at level 7 of AQF.</p>
14.	Commonwealth Scholarships Guidelines (Research) 2017 https://www.legislation.gov.au/Details/F2016L01602	Guide & Guidelines AQF also mentioned in: Explanatory Memorandum	These guidelines set out the purpose and the programs under which grants may be made for postgraduate research scholarships and revokes the Commonwealth Scholarships Guidelines (Research) 2012.	<p>In subsection i.v.ii of Chapter i:</p> <p>AQF is defined as the Australian Qualifications Framework Second Edition January 2013.</p> <p><i>Research Doctorate</i> means a Level 10 Doctoral Degree (Research) qualification as described in the AQF.</p>

S. No.	Name	Type	Brief Description	AQF use
				<p><i>Research Masters</i> means Level 9 Masters Degree (Research) qualification as described in the AQF.</p> <p>The definitions of Research Doctorate and Research Masters incorporated in the Guidelines are contained in the Australian Qualifications Framework (AQF) Second Edition January 2013 (2013 Framework).</p> <p>Subparagraph 1.6.5 sets out the period of support for RTP Scholarship for Research Doctorates and Research Masters degrees which provides an appropriate amount of time for a student to complete a Research Doctorate and aligns with expected timeframes identified in the Australian Qualifications Framework (AQF) specification for the Research Doctoral Degree.</p>
15.	Coursework Awards Rule 2016 (No. 2) https://www.legislation.gov.au/Details/F2016L01980	Rules	This instrument provides a framework in relation to the undertaking of programs of study leading to the award of coursework awards of the University.	<p>Subdivision 1.1(4) defines AQF as the Australian Qualifications Framework as in force at the commencement of this instrument.</p> <p>Point 8 and 9 in the section 52 state that a degree of Master by coursework (AQF level 9) and a degree of Master extended (AQF level 9) must be classified <i>Awarded with Commendation or Awarded</i>.</p>
16.	Defence Determination 2016/19, Conditions of service	Determination	This determination sets out the provisions on Australian Defence Force (ADF) conditions of service. It provides a scheme of	In Volume 1, Division 5 states provisions around Career transition training to provide access to eligible members who may take vocational training courses for post-termination employment and employment-related work skills. Subdivision 3(2.2.21) states that any vocationally-oriented course, or

S. No.	Name	Type	Brief Description	AQF use
	https://www.legislation.gov.au/Details/F2018C00053		transitional and savings provisions that will preserve accrued rights and liabilities under the former Principal Determination. The provisions also allow for eligibility that started under the former Principal Determination to continue, where applicable, under the new Principal Determination. It removes provisions relating to Australian Defence Force Cadets inline with the amendment to the Defence Act 1903 made by the Defence Legislation Amendment (First Principles) Act 2015 to commence on 1 July 2016.	recognised course segment, within the Australian qualifications framework may be approved as career transition training. It must meet policy requirements, particularly regarding the extent of training and that it is essential for the member's career transition.
17.	Disability Standards for Education 2005 https://www.legislation.gov.au/Details/F2005L00767	Standards	The primary purpose of the Standards is to make more explicit the obligations of education and training service providers under the	In Section 1.5 of Part 1, Organisations that endorse training packages within the Australian Qualifications Framework are mentioned in the list of education providers that are bound by the Standards.

S. No.	Name	Type	Brief Description	AQF use
			Disability Discrimination Act 1992 and the rights of people with disabilities in relation to education and training.	
18.	Family Law (Family Dispute Resolution Practitioners) Regulations 2008 https://www.legislation.gov.au/Details/F2009C00158	Regulations	SLI 2008 No. 183 Regulations as amended, taking into account amendments up to SLI 2009 No. 18	Section 3 states that Australian Qualifications Framework has the meaning given in the Dictionary to the <i>Higher Education Support Act 2003</i> . Also gives the definition <i>Vocational Graduate Diploma of Family Dispute Resolution</i> as the vocational graduate diploma recognised under the Australian Qualifications Framework and mentioned it as the competency requirement for accreditation as a family dispute resolution practitioner.
19.	Financial Viability Risk Assessment Requirements 2011 https://www.legislation.gov.au/Details/F2011L01405	Legislative Instrument AQF mentioned in: Explanatory Statement	This instrument provides that on 1 July 2011, the National VET Regulator assumed regulatory responsibility for functions that were previously performed by the states and territories in relation to the matters dealt with by the Act (Victoria and Western Australia retain regulatory responsibility	In Purpose and Operation section of Explanatory Statement, the VET Quality Framework is defined as comprised of the Standards for NVR Registered Training Organisations, the Australian Qualifications Framework , the Fit and Proper Person Requirements, the Financial Viability Risk Assessment Requirements and the Data Provision Requirements.

S. No.	Name	Type	Brief Description	AQF use
			for some organisations residing within their jurisdictions).	
20.	Fit and Proper Person Requirements 2011 https://www.legislation.gov.au/Details/F2011L01341	Legislative Instrument <u>AQF mentioned in:</u> Explanatory Statement	This instrument determines fit and proper person requirements for persons who exercise a degree of control or influence over the operation of a registered training organisation (RTO).	The Australian Qualifications Framework is mentioned as one of the components of the VET Quality Framework along with the Standards for NVR Registered Training Organisations, the Fit and Proper Person Requirements, the Financial Viability Risk Assessment Requirements and the Data Provision Requirements.
21.	Funding Rules for schemes under the Discovery Programme 2016– Future Fellowships https://www.legislation.gov.au/Details/F2016L00225	Legislative Instrument	This instrument relates to the Future Fellowships for funding commencing in 2016 funded under the Discovery Programme of the ARC’s National Competitive Grants Program.	Part A(A3) defines <i>PhD</i> as a qualification that meets the level 10 criteria of the AQF Second Edition January 2013 . Under Part B(B6.3), Eligibility Criteria for the Future Fellow states that if the Future Fellowship Candidate holds a research higher degree other than PhD, it is Administering Organisation’s responsibility to ensure that the candidate’s qualification meets level 10 criteria of the AQF Second Edition January 2013 .
22.	Higher Education (Courses of Study in Respect of Which Students are Ineligible for Enrolment as	Determinations <u>AQF mentioned in:</u>	This instrument specifies that postgraduate research courses at either a Masters or Doctoral level are not courses of study in respect of which students may be	In section, <i>Overview of the instrument</i> , it is mentioned that this instrument is made under paragraph 36-15(2)(b) of the Higher Education Support Act 2003 and determines that Research Masters degrees and Research Doctoral degrees (which are described in the Australian Qualifications Framework) are

S. No.	Name	Type	Brief Description	AQF use
	Commonwealth Supported Students) Determination 2017 https://www.legislation.gov.au/Details/F2017L01287	Explanatory Statement	enrolled as Commonwealth supported students. This has the effect of preventing these students from being charged a student contribution amount for units of study that form part of their research degree.	courses of study in respect of which students may not be enrolled as Commonwealth supported students.
23.	Higher Education (Designated Courses of Study) Specification 2011 https://www.legislation.gov.au/Details/F2011L02600	Specifications	This instrument specifies all higher education courses leading to a diploma, advanced diploma or associate degree qualification and enabling courses as designated courses of study in relation to a Table A provider to allow the Government to allocate Commonwealth supported places to Table A providers under paragraph 30 10(1)(a) of the Act.	Under section 4, <i>advanced diploma, associate degree and diploma</i> has been defined as awards that are specified as higher education awards in the Australian Qualifications Framework with the AQF Qualifications of Advanced Diploma, Associate Degree and Diploma respectively. It also defined Australian Qualification Framework same as in <i>Higher Education Support Act 2003</i> and AQF Qualification is defined same as in AQF .
24.	Higher Education Support Act 2003	Act	Act No. 149 of 2003 as amended, taking into account amendments up to	Clause 1 of Schedule 1 gives the definition of Australian Qualifications Framework as a framework for recognition and endorsement of qualifications and is established by Council consisted of Commonwealth, State and territory ministers

S. No.	Name	Type	Brief Description	AQF use
	https://www.legislation.gov.au/Details/C2018C00023	Compilation No. 66	<p>Statute Update (Winter 2017) Act 2017</p> <p>An Act relating to the funding of higher education, and for other purposes</p> <p>This is a compilation of the <i>Higher Education Support Act 2003</i> that shows the text of the law as amended and in force on 20 September 2017 (the compilation date).</p>	<p>responsible for higher education and that is to give effect to agreed standards in relation to the provision of education in Australia; as in force from time to time.</p> <p>Australian Qualifications Framework Register is defined as the Register of Recognised Education Institutions and Authorised Accreditation Authorities in Australia and is maintained by the advisory board to the AQF.</p> <p>Definitions of <i>Higher Education Award</i>, <i>VET Advanced Diploma</i>, <i>VET Diploma</i>, <i>VET Graduate Certificate</i> and <i>VET Graduate Diploma</i> are also provided based on the Australian Qualifications Framework.</p>
25.	<p>Higher Education Standards Framework (Threshold Standards) 2015</p> <p>https://www.legislation.gov.au/Details/F2015L01639</p>	Standards	<p>This instrument makes the Provider Registration Standards, the Provider Category Standards, the Provider Course Accreditation Standards and the Qualification Standards which comprise a subset of the Higher Education Standards</p>	<p>The Standards adopt the 'qualification' terminology of the Australian Qualifications Framework.</p> <p>Point 3 in subsection 1.5(1) states that when an Australian Higher Education Qualification is offered, its learning outcomes are consistent with level classification of that qualification in Australian Qualifications Framework.</p> <p>Point 4e states that if the qualification is recognised by AQF, the testamur, record of results or graduation statement is certified</p>

S. No.	Name	Type	Brief Description	AQF use
			Framework known as the Threshold Standards.	<p>with either the AQF logo or the words, ‘This qualification is recognised within the Australian Qualifications Framework’.</p> <p>Non AQF qualifications are not described using AQF nomenclature.</p> <p>Point Subsection 7.3(c) states that the AQF recognition status needed to be included for all higher education courses of study within the repository of information.</p>
26.	Higher Education Support (VET) Guideline 2015 https://www.legislation.gov.au/Details/F2015L02124	Guide and Guidelines	This instrument revokes and replaces the VET Guidelines 2015	<p>Section 22 states that at least 100 enrolments in courses leading to awards of AQF qualifications is one of the Financial viability requirements for the <i>first body</i>.</p> <p>In section 23, Australian Qualifications Framework, to the extent that it relates to VET is mentioned as one of the Quality requirement for the NVR registered training organisations and for VET providers that are registered by an agency or authority of Western Australia and Victoria.</p>
27.	Higher Education Support Act 2003 – Commonwealth Scholarships Guidelines (Education) 2010 (DEEWR)	Guide and Guidelines	This instrument was revoked by the <u>Commonwealth Scholarships Guidelines (Education) 2013</u> on 12 December 2013. The revoking instrument is disallowed in full by the	Section 1.5 gives the definition of AQF as Australian Qualifications Framework which is a unified system of national qualifications which includes the higher education sector.

S. No.	Name	Type	Brief Description	AQF use
	https://www.legislation.gov.au/Details/F2013C00828		Senate at 20:02 on 17 March 2014. This instrument is therefore revived with effect from the day and time of disallowance as if it had not been revoked.	
28.	Insolvency Practice Rules (Bankruptcy) 2016 https://www.legislation.gov.au/Details/F2017C00699	Rules	Rules/Other as amended, taking into account amendments up to Insolvency Practice (Bankruptcy) Amendment (Minor Amendments) Rules 2017 This is a compilation of the <i>Insolvency Practice Rules (Bankruptcy) 2016</i> that shows the text of the law as amended and in force on 1 September 2017 (the <i>compilation date</i>).	Division 20 of Part 2 states that one of the qualifications requirements for registration as a trustee is that the applicant has completed the academic requirements for at least 2 course units accredited under the Australian Qualifications Framework Level 8 (or equivalent study) in the practice of external administrators of companies, receivers, receivers and managers, and trustees under the Act during the 5 years immediately preceding the day on which the application is made.
29.	Insolvency Practice Rules (Corporations) 2016	Rules	Rules/Other as amended, taking into account amendments up to Insolvency Practice Rules	Division 20 of Part 2 states that one of the qualifications requirements for registration as a liquidator is that the applicant has completed the academic requirements for at least 2 course units accredited under the Australian Qualifications Framework

S. No.	Name	Type	Brief Description	AQF use
	https://www.legislation.gov.au/Details/F2017C00915		(Corporations) Amendment 2017 (No.1) This is a compilation of the <i>Insolvency Practice Rules (Corporations) Act 2016</i> that shows the text of the law as amended and in force on 1 September 2017 (the <i>compilation date</i>).	Level 8 (or equivalent study) in the practice of external administrators of companies, receivers, receivers and managers, and trustees under the <i>Bankruptcy Act 1966</i> .
30.	Migration (IMMI 17/045: Specification of Training Benchmarks and Training Requirements) Instrument 2017 https://www.legislation.gov.au/Details/F2017L00796	Specifications	This instrument sets out the training benchmarks and training requirements for the purposes of certain provisions.	Schedule 1 (Training Benchmarks and Training Requirements) of Part 3 (Transitional provisions) states that one of the applicable expenditures that can count towards Training Benchmark B for an established business is the payments to RTOs to deliver face-to-face training to Australian employees that will contribute to an Australian Qualifications Framework qualification .
31.	Migration (IMMI 17/074: Specification of Training Requirements) Instrument 2017	Specifications	This instrument specifies training benchmarks and requirements for the purposes of certain provisions of the Migration Regulations 1994.	Schedule 1 (Training and Requirements) of Part 3 (Transitional provisions) states that one of the applicable expenditures that can count towards Training Benchmark B for an established business is the payments to RTOs to deliver face-to-face training to Australian employees that will contribute to an Australian Qualifications Framework qualification .

S. No.	Name	Type	Brief Description	AQF use
	https://www.legislation.gov.au/Details/F2017L00789			
32.	Migration Act 1958 https://www.legislation.gov.au/Details/C2017C00384	Act	An Act relating to the entry into, and presence in, Australia of aliens, and the departure or deportation from Australia of aliens and certain other persons	In Volume 1, Section 140GBC of Division 3A (Sponsorship) specifies skill and occupational exemptions for approved sponsors. It states that the approved sponsor is exempt from the requirement to satisfy the labour market testing condition if a relevant associate degree, advanced diploma or diploma covered by the AQF , other than a protected qualification is required for the nominated position, in relation to the nominated occupation. AQF is defined as Australian Qualifications Framework within the meaning of the <i>Higher Education Support Act 2003</i> .
33.	Migration Regulations 1994 https://www.legislation.gov.au/Details/F2017C01164	Regulations	SR 1994 No. 268 Regulations as amended, taking into account amendments up to <i>Migration Legislation Amendment (2017 Measures No. 4) Regulations 2017</i>	In Regulation 2.26 AC of Volume 1: <i>degree</i> is defined as a formal educational qualification, under the Australian Qualifications Framework , awarded by an Australian educational institution as a degree or a postgraduate diploma. One of the definitions of <i>diploma</i> is a diploma, or an advanced diploma, under the Australian Qualifications Framework , that is awarded by a body authorised to award diplomas of those kinds.

S. No.	Name	Type	Brief Description	AQF use
				<p>One of the definitions of <i>trade qualification</i> is a qualification, under the Australian Qualifications Framework, of at least the Certificate III level for a skilled occupation in Major Group IV in the ASCO; or</p> <p>a qualification, under the Australian Qualifications Framework, of at least the Certificate III level for a skilled occupation in Major Group 3 in ANZSCO.</p> <p>In Volume 3, Visa conditions (Schedule 8) specifies that if the visa holder is not a Defence student, a Foreign Affairs student or a secondary exchange student, then holder must maintain full-time enrolment in a registered course that, once completed, will provide a qualification from the Australian Qualifications Framework. The qualification must be at same level as, or at a higher level than, the registered course in relation to which the visa was granted except if the holder is enrolled in a course at AQF level 10 and changes their enrolment to a course at AQF level 9.</p>
34.	Migration Regulations 1994 - DETERMINATION – MEANING OF ENROLLED IN FULL-TIME STUDY AT AN EDUCATIONAL	Determinations	This instrument determines the meaning of enrolled in full time study for the purposes of subparagraph 2.06AAB(2)(a)(ii) of the <i>Migration Regulations 1994</i> .	<p>One of the conditions for an applicant to be determined as enrolled in full-time study is to enrol full-time at an educational institution authorised to issue an Australian Qualifications Framework qualification, in a course leading to the award of AQF Level 1 qualification or higher, where:</p> <p>1. for courses leading to the award of an AQF Level 1 qualification—the applicant is limited to undertaking a single</p>

S. No.	Name	Type	Brief Description	AQF use
	INSTITUTION 2015 – IMMI 15/070 https://www.legislation.gov.au/Details/F2015L00526			course at that level for the purposes of full time study under this Instrument; or 2. for courses leading to the award of an AQF Level 2 qualification or higher—the applicant may undertake one or more courses at those levels for the purposes of full-time study under this Instrument.
35.	Migration Regulations 1994 – SPECIFICATION OF ENGLISH LANGUAGE TESTS AND EVIDENCE EXEMPTIONS FOR SUBCLASS 500 (STUDENT) VISAS 2016/019 – IMMI 16/019 https://www.legislation.gov.au/Details/F2016L00629	Specifications	This instrument specifies the English language requirements that subclass 500 (student) applicants must meet, as well as specifying the applicants who are exempt from having to provide evidence.	Specify that one of the classes of applicants who are exempted from providing evidence of English language proficiency are those who have successfully completed a substantial component of a course leading to a qualification from Australian Qualifications Framework at the Certificate IV level or higher that was conducted in Australia in English while the applicant was holding a Student visa.
36.	Migration Regulations 1994 – SPECIFICATION OF TYPES OF COURSES FOR STUDENT VISAS – IMMI 14/015	Specifications <u>AQF mentioned in:</u>	This specification provides the types of courses for each subclass of student visa, except Subclass 576 (AusAID or Defence Sector).	The purpose of the Instrument is to amend certain types of courses under Subclass 572 (Vocational Education and Training Sector) and Subclass 573 (Higher Education Sector). For Diplomas, Advanced Diplomas, Graduate Certificates and Graduate Diplomas, the education sector of the provider offering the course is mentioned between brackets to clarify that there is

S. No.	Name	Type	Brief Description	AQF use
	https://www.legislation.gov.au/Details/F2014L00320	Explanatory Statement		no sectoral distinction between these courses. This update will better align the types of courses in the Instrument with the Australian Qualifications Framework .
37.	Migration Regulations 1994 – Specification under clause 485.231 – QUALIFICATIONS – IMMI 13/013 https://www.legislation.gov.au/Details/F2013L00528	Specifications	Specifications for the purposes of subclause 485.231(1) of the <i>Migration Regulations 1994</i> .	This instrument specifies that the new post-study work arrangements will apply to graduates of a Bachelor Degree, Bachelor Degree with Honours, Masters by Coursework, Masters by Research, Masters (Extended) or Doctoral degree i.e., study undertaken at Australian Qualifications Framework Level 7 or higher . All subclass 485 visa applicants must meet the Australian study requirement in the six months immediately prior to making their visa application and have obtained their qualification at an eligible educational institution.
38.	National Vocational Education and Training Regulator (Transitional Provisions) Act 2011 https://www.legislation.gov.au/Details/C2017C00249	Act	An Act to deal with transitional matters arising from the enactment of the <i>National Vocational Education and Training Regulator Act 2011</i> , and for related purposes	In Part 3 (Continuation for existing course accreditation etc.) of Schedule 1: Point 3 of Subdivision 16 (Accreditation of VET accredited courses continue in force) of Part 3 (Continuation for existing course accreditation etc.) clarifies that, despite continuing accreditation under new arrangements, courses cannot be guaranteed to meet the Standards for VET accredited courses or the Australian Qualifications Framework . Point 4 of Subdivision 19 (Pending applications for renewal of accreditation—referring States and Territories) states that, an inference that a course (with pending accreditation decision) meets the Standards for VET accredited courses or the Australian Qualifications Framework is not to be made only because the

S. No.	Name	Type	Brief Description	AQF use
				<p>course is taken to be a VET accredited course for the period until the decision is made.</p> <p>Point 6 of Subdivision 20 (Extension of time for considering applications) specifies that, if the regulator doesn't extend the period to consider an application or extend the period to consider an application by 6 months, and does not complete the assessment within that timeframe, the course will be accredited for 2 years from the end of the 6 month period, HOWEVER, even if this occurs the course cannot be assumed to meet the Standards for VET accredited courses or the Australian Qualifications Framework.</p>
39.	<p>National Vocational Education and Training Regulator Act 2011</p> <p>https://www.legislation.gov.au/Details/C2017C00245</p>	Act	An Act to establish the National Vocational Education and Training Regulator, and for related purposes	<p>Defines Australian Qualifications Framework as in the <i>Higher Education Support Act 2003</i>.</p> <p>Specifies that the Australian Qualifications Framework as one of the components of <i>VET Quality Framework</i> along with other standards and requirements.</p> <p>In Division 1 (Registering as an NVR registered training organisation) of Part 2 (Registration), compliance with Australian Qualifications Framework is specified as one of the conditions for registering as an NVR registered training organisation (Section 22).</p>

S. No.	Name	Type	Brief Description	AQF use
				<p>In Division 1 (Applying for accreditation) of Part 3 (Accreditation of courses), it is stated that one of the conditions in deciding whether to grant an application for accreditation of course by the National VET Regulator is that the course meets the standards for Australian Qualifications Framework (Section 44).</p> <p>In Division 5 (Cancelling accreditation), VET accredited course not meeting the standards for Australian Qualifications Framework is specified as one of the conditions to cancel the accreditation by National VET Regulator (Section 52).</p>
40.	Part 147 Manual of Standards (MOS) (as amended) https://www.legislation.gov.au/Details/F2013C00521	Standards	<p>This is the MOS for Part 147 of the <i>Civil Aviation Safety Regulations 1998</i> (CASR 1998).</p> <p>This MOS sets out the requirements to be met by an organisation holding an approval issued under Part 147 of CASR 1998 to conduct training and assessment.</p>	<p>Clause 147.A.106 of Subpart B (Organisational requirements) specifies that for a person to be appointed as an assessor for category training, it is necessary to have competencies, among other, in planning and organising assessment, assessing competence and participating in confirming assessment that meet the current requirements for training and assessment under the Australian Qualifications Framework determined by the National Skills Standards Council, or its successors, in effect at the time of delivery and assessment.</p>
41.	Patents Regulations 1991 https://www.legislation.gov.au/Details/F2017C00128	Regulations Compilation No. 64	<p>This is a compilation of the <i>Patents Regulations 1991</i> that shows the text of the law as amended and in</p>	<p>AQF means Australian Qualifications Framework</p> <p>Part 2 of Chapter 20 (Individual Patent Attorneys) specifies the regulations around obtaining registration as a patent attorney for the first time. In Regulation 20.6, it states that the Designated</p>

S. No.	Name	Type	Brief Description	AQF use
			force on 24 February 2017 (the <i>compilation date</i>).	Manager must only approve an applicant for registration if the applicant has, or is entitled to a level 5 or higher AQF , or NZQF, qualification or equivalent (in case, the qualification awarded by an overseas institution). The Board must be satisfied that the qualification is appropriate for a patent attorney i.e., in the field of science and technology that contains potentially patentable subject matter and involves a depth of study that the Board considers is sufficient to provide an appropriate foundation for practise as a patent attorney.
42.	Research Awards Rule 2017 https://www.legislation.gov.au/Details/F2017L01614/Download	Rules	This instrument provides a framework in relation to the undertaking of programs of study leading to the award of research awards of the University.	AQF means Australian Qualification Framework as in force at the commencement of this section The Rule 41 of Division 4.4 (Other program requirements) states that a student enrolled in a program for a research award must not undertake, or continue to undertake, any other studies at AQF level 5 or higher while the student is enrolled in the program unless the Delegated Authority, on the written application of the student and in writing, approves the student undertaking the studies while the student is enrolled in the program.
43.	Social Security Act 1991 https://www.legislation.gov.au/Details/C2018C00007/Download	Act	An Act to provide for the payment of certain pensions, benefits and allowances, and for related purposes	In Volume 1, Section 28B (Approved training courses for training supplement) specifies that the conditions for which the Secretary may approve a training course for training supplement for a person. Two of three conditions are as follows: If the person has not completed the final year of secondary school or an equivalent level of education and the course is not more than 12 months in duration and is accredited at Certificate I,

S. No.	Name	Type	Brief Description	AQF use
				<p>Certificate II, Certificate III or Certificate IV level in the Australian Qualifications Framework; or in the Secretary's opinion, is equivalent to a course accredited at any of those levels.</p> <p>If the person has been awarded a VET qualification accredited at Certificate I, Certificate II, Certificate III or Certificate IV level in the Australian Qualifications Framework; and is not studying for, and has not been awarded, a qualification accredited at diploma level or higher in the Australian Qualifications Framework and the course leads to a qualification that, in the Australian Qualifications Framework, is directly related to, and at a higher level than, the person's VET qualification; or would, in the Secretary's opinion, enhance the person's prospects of employment by allowing the person to acquire skills in a trade or field other than the trade or field covered by the person's VET qualification.</p> <p>Australian Qualifications Framework has the meaning given by the Higher Education Support Act 2003.</p>
44.	Standards for NVR Registered Training Organisations 2012 https://www.legislation.gov.au/Details/F2013L00167	Standards	This instrument revokes and remakes the Standards for NVR Registered Training Organisations 2011 and ensures nationally consistent, high-quality training and	<p>Australian Qualifications Framework (AQF) has the meaning given at section 3 of the <i>National Vocational Education and Training Regulator Act 2011</i>.</p> <p><i>Training Package</i> means a nationally endorsed, integrated set of competency standards, assessment requirements, Australian</p>

S. No.	Name	Type	Brief Description	AQF use
			assessment services for the clients of Australia's vocational education and training (VET) system.	<p>Qualifications Framework qualifications, and credit arrangements for a specific industry, industry sector or enterprise.</p> <p>SNR12 (Strategy for certification, issuing and recognition of qualifications & statements of attainment) of Part 2 (Essential standards for initial registration) states that the applicant for initial registration must identify how it will issue to persons whom it has assessed as competent in accordance with the requirements of the Training Package or VET accredited course, a VET qualification or VET statement of attainment (as appropriate) that meets the Australian Qualifications Framework requirements.</p> <p>The applicant must also confirm that it will recognise the AQF and VET qualifications and VET statements of attainment issued by any other RTO.</p> <p>SNR 13 (Strategy for accuracy and integrity of marketing) of Part 2 (Essential standards for initial registration) states that the applicant must demonstrate that its proposed marketing and advertising of AQF and VET qualifications to prospective clients is ethical, accurate and consistent with its scope of registration.</p> <p>SNR23 (Certification, issuing and recognition of qualifications & statements of attainment) of Part 3 (Essential standards for continuing registration) states that the NVR registered training</p>

S. No.	Name	Type	Brief Description	AQF use
				<p>organisation must issue to persons whom it has assessed as competent in accordance with the requirements of the Training Package or VET accredited course, a VET qualification or VET statement of attainment (as appropriate) that meets the Australian Qualifications Framework (AQF) requirements.</p> <p>The NVR registered training organisation must recognise AQF and VET qualifications and VET statements of attainment issued by any other RTO.</p> <p>SNR 24 (Accuracy and integrity of marketing) states that the NVR registered training organisation must ensure its marketing and advertising of AQF and VET qualifications to prospective clients is ethical, accurate and consistent with its scope of registration.</p>
45.	Standards for VET Accredited Courses 2012 https://www.legislation.gov.au/Details/F2013L00177	Standards	This instrument revokes and remakes the <i>Standards for VET Accredited Courses 2011</i> , which formally identifies the requirements for accrediting VET courses previously found in the Australian Quality Training Framework (AQTF), and are not intended to change the existing standards for accrediting courses found	<p>Uses same meaning of Australian Qualifications Framework (AQF) as given by section 3 of the <i>National Vocational Education and Training Regulator Act 2011</i>.</p> <p><i>Training Package</i> is a nationally endorsed, integrated set of competency standards, assessment requirements, Australian Qualifications Framework qualifications, and credit arrangements for a specific industry, industry sector or enterprise.</p> <p>In VAC 5 (Purpose of the Standards), it is mentioned that these standards apply to the course design for VET accredited courses. Accreditation of a course is confirmation by the National VET</p>

S. No.	Name	Type	Brief Description	AQF use
			in the AQTF except where necessary to reflect the new legislative regime.	<p>Regulator that the course meets the Standards for VET Accredited Courses and the Australian Qualifications Framework. Where the course leads to a VET qualification, its alignment to the appropriate level of the AQF is one of the conditions for accrediting the course by National VET Regulator.</p> <p>In point 7.3 of VAC 7 (Course design standards), it is specified that VET accredited courses either:</p> <p>(a) lead to a VET qualification and have course outcomes that are consistent with the Australian Qualifications Framework qualification descriptor identified for the course; or</p> <p>(b) lead only to a VET statement of attainment when course outcomes meet an identified industry/enterprise/ community need but do not have the breadth and depth required for a VET qualification as stated in the guidelines for qualifications in the Australian Qualifications Framework. The course title will read 'Course in...'. </p>
46.	Standards for VET Regulators 2015 https://www.legislation.gov.au/Details/F2017C00444	Standards	Standards/Other as amended, taking into account amendments up to <i>Standards for VET Regulators (Amendment) 2017</i> .	<p>In Glossary: Accredited short course is defined as a course accredited by the VET Regulator in accordance with the Standards for VET Accredited Courses that leads to an AQF statement of attainment.</p> <p>AQF qualifications means an AQF qualification type endorsed in a training package or accredited in a VET accredited course.</p>

S. No.	Name	Type	Brief Description	AQF use
				<p>Australian Qualifications Framework (AQF) means the framework for regulated qualifications in the Australian education and training system, as agreed by the Commonwealth, State and Territory ministerial council with responsibility for higher education.</p> <p>Training product means AQF qualification, skill set, unit of competency, accredited short course and module.</p> <p>Australian Qualifications Framework is one of the components of VET Quality Framework.</p> <p>Standard 1 of Part 2 (Regulator Standards) specifies that the VET Regulator effectively and efficiently regulates RTOs. In the list of requirements to be met by VET Regulator to be complaint with the Standard 1, it is stated that the VET Regulator can only grants an application to add any AQF qualification or assessor skill set from the Training and Education Training Package (or its successor) to the RTO's scope of registration, if an RTO has:</p> <ul style="list-style-type: none"> a) held registration for at least two years continuously at the time of adding the qualification and/or skill set to scope; and b) from 1 January 2016, undergone an independent validation of its assessment system, tools, processes and outcomes in accordance with the requirements contained in the Standards for RTOs (Point 1.5).

S. No.	Name	Type	Brief Description	AQF use
				<p>In point 1.6, it is specified that the VET Regulator ensures that where an AQF qualification is no longer current and is not superseded, the VET Regulator removes the qualification from the RTO's current scope of registration two years from the date the qualification was removed or deleted from the National Register.</p> <p>Standard 2 of Part 2 (Regulator Standards) specifies that courses are to be accredited in accordance with the Standards for VET Accredited Courses to maintain the integrity of AQF qualifications.</p>
47.	Telecommunications Cabling Provider Rules https://www.legislation.gov.au/Details/F2014L01684	Rules	These rules have been made by the Australian Communications and Media Authority to replace the <i>Telecommunications Cabling Provider Rules 2000</i> , Accreditation Procedures for Cabling Provider Registrars and the Arrangements for Operation of the Registration System (No. 3).	<p>This Schedule details the competency requirements that cabling providers need to satisfy in order to be registered to perform open, restricted and lift cabling work.</p> <p>These requirements are the basis on which the National Skills Standards Council (NSSC) via their Industry Training Advisory Bodies, originally developed competency standards and related training for cabling, within the Australian Qualifications Framework and Australian Recognition Framework.</p>
48.	Tertiary Education Quality and	Act	Act No. 73 of 2011 as amended, taking into	Australian Qualifications Framework has the same meaning as in the <i>Higher Education Support Act 2003</i> .

S. No.	Name	Type	Brief Description	AQF use
	Standards Agency Act 2011 https://www.legislation.gov.au/Details/C2017C00271		account amendments up to <i>Public Governance and Resources Legislation Amendment Act (No. 1) 2017</i> . An Act to regulate higher education, and for other purposes.	<i>Higher Education Award</i> is defined in terms of AQF as: (a) a diploma, advanced diploma, associate degree, bachelor degree, graduate certificate, graduate diploma, masters degree or doctoral degree; or (b) a qualification covered by level 5, 6, 7, 8, 9 or 10 of the Australian Qualifications Framework ; or (c) an award of a similar kind, or represented as being of a similar kind, to any of the above awards; other than an award offered or conferred for the completion of a vocational education and training course.
49.	Tertiary Education Quality and Standards Agency (Consequential Amendments and Transitional Provisions) Act 2011 https://www.legislation.gov.au/Details/C2011A00074	Act	An Act to deal with consequential and transitional matters arising from the enactment of the <i>Tertiary Education Quality and Standards Agency Act 2011</i> , and for other purposes.	Clause 24 of Part 1 (Amendments about higher education support) states to repeal the definition of Australian Qualifications Framework in Subclause 1(1) of Schedule 1 of <i>Higher Education Support Act 2003</i> and substitute it with the following: Australian Qualifications Framework means the framework for recognition and endorsement of qualifications: (a) that is established by the Council consisting of the Ministers for the Commonwealth and each State and Territory responsible for higher education; and (b) that is to give effect to agreed standards in relation to the provision of education in Australia;

S. No.	Name	Type	Brief Description	AQF use
				as in force from time to time.
50.	Trade Marks Regulations 1995 https://www.legislation.gov.au/Details/F2017C00153	Regulations	Regulations as amended, taking into account amendments up to <i>Intellectual Property Legislation Amendment (Single Economic Market and Other Measures) Regulation 2016</i> .	AQF means the Australian Qualifications Framework . In Part 20 (Registered trade marks attorneys), Regulation 20.6 (Academic qualifications) of Division 2 (Obtaining registration for first time) states that the Designated Manager must not approve an applicant for registration as a trade marks attorney unless the applicant has or is entitled to: (a) a level 5 or higher AQF qualification; or (b) a qualification awarded by an overseas institution that the Board is satisfied is equivalent to a level 5 or higher AQF qualification.
51.	VET Student Loans Act 2016 https://www.legislation.gov.au/Details/C2017C00183	Act	Act No. 98 of 2016 as amended, taking into account amendments up to <i>Education and Other Legislation Amendment Act (No. 1) 2017</i> An Act to provide for loans to students for vocational education and training, and for related purposes.	Australian Qualifications Framework is defined as the framework for recognition and endorsement of qualifications: (a) that is established by the Council consisting of the Ministers for the Commonwealth and each State and Territory responsible for higher education; and (b) that is to give effect to agreed standards in relation to the provision of education in Australia; as in force from time to time. Clause 14.1 of Division 3 (Approved courses) specifies that the approved course must be a structured and integrated program of vocational education or vocational training that leads to one of the following:

S. No.	Name	Type	Brief Description	AQF use
				<p>(a) a qualification:</p> <p>(i) of diploma, advanced diploma, graduate certificate or graduate diploma in the Australian Qualifications Framework; and</p> <p>(ii) that meets the guidelines for a VET award as set out in the Australian Qualifications Framework;</p> <p>(b) a qualification specified by the rules.</p>
52.	<p>Workplace Relations Legislation Amendment Act 2002</p> <p>https://www.legislation.gov.au/Details/C2004A01064</p>	Amendment Act	An Act to amend laws relating to workplace relations, and for other purposes.	<p>Clause 19 specifies to repeal the definition higher education institution in subsection 3(1) of <i>Equal Opportunity for Women in the Workplace Act 1999</i> and substitute it with the following:</p> <p>Higher education institution means a university or other institution of higher education that is included in:</p> <p>The Australian Qualifications Framework Register of Authorities empowered by Government to Accredit Post-Compulsory Education and training; or</p> <p>The Australian Qualifications Framework register of Bodies with Authority to Issue Qualifications;</p> <p>as an institution authorised to issue higher education awards (within the meaning of section 106ZL of the <i>Higher Education Funding Act 1988</i>).</p>

APPENDIX 2: STATES AND TERRITORIES LEGISLATION AND THE AQF⁵⁶

South Australia Legislation	Comment
Training & Skills Development Act, 2008	AQF referred to in multiple places in generic terms such as: “qualifications under the AQF”
Rail Safety National Law SA Act 2012	Generic references relating to certification for certain skills “under the AQF”. Generic references relating to competence assessed in accordance with units and qualifications “recognised under the AQF”.
Tasmania Legislation	Comment
Training and Workforce Development Act 2013 Item 4 – Interpretation	Defines vocational education and training as being “under Levels 1,2,3,4,5,and 6 of the AQF”
Education Act 2016 Division 3 -Youths, Subdivision 1 – Path in a completion of approved learning programs or home education	Designates participation in approved learning program as (1) (a) (ii) “obtains a certificate III qualification within the meaning of the AQF”
Occupational Licensing Act 2005	Uses “AQF” in generic terms in definition of “an appropriate course of training”.
Office of Tasmanian Assessment, Standards & Certification Act 2003	Defines Australian Qualifications Framework as the framework for registered training programs.

⁵⁶ Blue text indicates the legislation that is most likely to be affected by changes to the AQF levels or qualifications

Tasmania Legislation	Comment
Water management Regulations 2009 Part 1 – Preliminary 3 - Interpretation	Defines “national qualification” for a Class 1 licence as meaning “Certificate III in the field of study....” Or Class 2 licence as “Certificate IV within the field of study recognised within the AQF”.
Conveyancing Regulations 2015 Part 2 Qualifications & Experience	Defines requirements to hold a conveyancing licence to include: 4 (1) (a) (iii) Advanced Diploma/Diploma delivered and assessed by a Registered Training Organisation in accordance with the AQF”

Western Australia Legislation	Comment
Higher Education Act 2004	Defines the AQF
Rail Safety National Law WA Act 2015 Subdivision 4, 117 Assessment of Competence	(2) (a) (i) “in accordance with provisions of the AQTF and any units of competence recognised under AQF”. (3) Certificates issued under AQF are evidence of competence
Liquor Control regulations 1989 Education & training Course	(10d) (1a) an appropriate viticulture course leading to a qualification recognised under the AQF
Vocational Education & Training (General) Regulations 2009	Included under information to help RTOs complete the Training Contract is the requirement to include titles and levels on AQF certificates of attainment.

Queensland Legislation	Comment
Education (Accreditation of Non-State Schools) Regulation 2017 Part 2 Accreditation criteria	(5) “A schools education program may also include: (a) a vocational education and training course at level 1 or above under the AQF”

Queensland Legislation	Comment
Education and Care Services National Regulations Subdivision 3, 299F (4)	Defines categories of specified persons as requiring a Certificate III or IV in community services under the AQF.
Education (General Provisions) Act 2006	Provides definitions of Certificate III and IV under the AQF
Education (Queensland Curriculum and Assessment Authority) Regulation 2014	Defines Vocational Education and Training as a “qualification by the names of Certificate I, Certificate II, Certificate III, Certificate IV, Diploma or Advanced Diploma under the AQF.”
Further Education and Training Act 2014	Defines AQF
Agricultural Chemical Distribution Control Regulation 1998	Requires certain personnel to hold a “record of results given under the AQF”.
Mining & Quarrying Safety & Health Regulations 2017 Schedule 7 – Dictionary	Provides a definition of an “appropriate doctor” as one who, among other things: (a) (ii) has an Australian Qualifications framework level 8 or above qualification in Occupational Medicine
Payroll Tax Act 1971 Division 2 Exemptions, S 14 Exemption from Payroll Tax	Defines as exempt (9) Certificate II and III traineeships leading to qualification under the AQF

NSW Legislation	Comment
Education and Care Services National Regulation	Same as Queensland

NSW Legislation	Comment
<p>Higher education Act 2001, No 102 Part 2, Division 2, 7 Accreditation of Higher Education Courses</p>	<p>(2) A course may be accredited if it complies with the requirements of the AQF</p>
<p>Legal Profession Uniform Admissions Rules 2015 Schedule 2, part 3, Requirements for admission to practical legal training (PLT)</p>	<p>5 (a) (i) Diploma at least equivalent to level 8 under the AQF 7 (2) the level of PLT must be at least level 8 of the AQF</p>
<p>Teacher Accreditation Act 2004, No 65 Part 1, 3 Definitions</p>	<p>Definition of a degree meets the specifications under the AQF.</p>
<p>Pesticides Regulation 2017 Part 3, Clause 31 Persons qualified to use pesticides</p>	<p>(2) (a) training must be carried out by a Registered Training Organisation in accordance with the AQF.</p>
<p>Rail Safety National Law (NSW) No 82a Part 3, Division 6, Subdivision 4, 117 Assessment of competence</p>	<p>(2) (a) (i) must be assessed in accordance with units of competence recognised under the AQF.</p>

Victoria Legislation	Comment
<p>Education & Training Reform Act 2006</p>	<p>Defines the AQF and several of its components in the terms used in the AQF itself. The components are definitions of higher education award, vocational education and training, qualification, senior secondary</p>

Victoria Legislation	Comment
	certificate and statement of attainment. For example, senior secondary qualifications means qualifications described under the senior secondary certificate of education in the AQF.
Occupational Health & Safety Regulation 2017	Requires induction training to include courses “accredited under the AQF”.

ACT legislation	Comment
Education Act 2004 9C Meaning of completes year 12 - Act	(1) (c) a certificate equivalent to a year 12 certificate issued under the AQF eg AQF Certificate II
Education (Participation) Amendment Act 2009	As above
Training and Tertiary Education Act 2003 Dictionary	vocational education and training means the education and training and qualifications and statements of attainment under the vocational education and training provisions of the AQF, being the Australian Qualifications Framework under the Commonwealth Act, section 3.
Northern Territory Legislation	Comment
Higher Education Act 2016	Included only in definitions to define what AQF is and that a degree must fall within the AQF.
Training & Development Act	Has no mention of AQF

APPENDIX 3: INDUSTRIAL AGREEMENTS REFERRING TO AQF

Industry / Occupation	Comments	Allowances linked to holding or obtaining a trade certificate, licence or qualification	"AQF"	"Qualification/s"	"Certificate/s"	"Degree/s"	"Diploma/s"
Aboriginal Community Controlled Health Services	Certain categories of worker are defined according to whether they have completed specified diploma or certificate courses. See Schedule B .	Employees competently bilingual* and regularly required in the course of their duties to use these languages are paid an allowance at a specified percentage of their standard annual rate. See Clause 15.1 . *Proof of proficiency and accreditation required. Accreditation may require completion of Diploma or Advanced Diploma in Translation or Interpreting from approved provider.		Schedule B	Schedule B		Schedule B
Aged Care	Certain categories of worker are defined according to whether they have completed specified diploma or certificate courses. See Schedule B .	None		Schedule B	Schedule B		Schedule B
Air Pilots	Not applicable. <i>Air pilots hold commercial pilot's licence or airline transport pilot's licence and categories of worker are classified by aircraft.</i>	None		16 19 (see 19.2) Schedule C Schedule E (not relevant)			
Aircraft Cabin Crew	Not applicable.	None	None	None	None	None	None
Airline Operations - Ground Staff	Apprentice and trainee minimum wages are specified according to specified markers of progress along specified AQF levels. See Clause 16 and Schedule E . Certain categories of worker are defined according to whether they have completed specified diploma or certificate courses. See Schedule B .	None	16 Schedule E	11 (see 11.6) 16 Schedule B Schedule E	16 Schedule B Schedule E		
Airport Employees	Apprentice and trainee minimum wages are specified according to specified markers of progress along specified AQF levels. See Schedule E . Certain categories of worker are defined according to whether they have completed specified certificate courses. See Schedule B .	None	Schedule E	Schedule B Schedule E	Schedule B Schedule E		Schedule B

Alpine Resorts	Certain categories of worker are defined according to whether they hold certain specified diploma or certificate qualification. See Schedule B . Instructors are defined according to whether they have obtained APSI Qualifications at levels 1, 2, 3, 4 or international equivalent qualification. See Schedule B and Schedule C .	None	Schedule B	Schedule B Schedule C	Schedule B Schedule C		Schedule B Schedule C
Aluminium Industry	Certain categories of worker are defined according to whether they have completed a relevant trade or post-trade certificate. See Schedule B .	None		Schedule B	Schedule B		
Ambulance and Patient Transport Industry	Certain categories of worker are defined according to whether they hold specified degree, diploma or qualifications. See Schedule B . Certain categories of worker holding specified qualifications are paid a skills allowance at a specified percentage of their weekly standard rate. See Clause 15 .	Certain categories of worker holding specified graduate diploma qualifications (or equivalent) are paid an allowance at a specified percentage of their standard weekly rate. See Clause 15.4 .		14 (see 14.2) 15 (see 15.4) Schedule B	Schedule B	Schedule B	15 (see 15.4) Schedule B
Amusement, Events and Recreation	Certain categories of worker are defined according to whether they hold specified trade certificate, post-trade or diploma qualification. See Schedule B .	None		Schedule B (see B.9)	Schedule B (see B.5)		Schedule B (see B.9)
Animal Care and Veterinary Services	Certain categories of worker are defined according to specified markers of progress along specified AQF levels. See Schedule B .	None	Schedule B	Schedule B			
Aquaculture Industry	Not applicable.	None	None	None	None	None	None
Architects	Certain categories of worker are defined according to whether they hold specified degree qualification and/or registered with AACA. See Clause 3 and Schedule B .	None		3 (see 3.1)			
Asphalt Industry	Not applicable.	None	None	None	None	None	None
Banking, Finance and Insurance	Certain categories of worker are defined according to whether they hold formal qualifications and/or specialised vocational training. See Schedule B .	None		Schedule B (see B.5)			
Black Coal Mining Industry	Certain categories of worker are defined according to whether they hold specified	None		Schedule B (see B.2.3)	schedule a Schedule B	Schedule B (see B.2.3)	

	degree qualifications or trade certificates. See Schedule A and Schedule B .						
Book Industry	Certain categories of worker are defined according to whether they hold degree qualifications. See Clause 13 .	None		13			
Broadcasting, Recorded Entertainment and Cinemas	Certain categories of worker are defined according to whether they hold specified trade certificate, diploma or degree qualifications. See Schedule B , Schedule C , Schedule F and Schedule H .	Indigenous employees who are required by their employer to have a recognised bilingual proficiency* in English and the employee's traditional Aboriginal and Torres Strait Islander language in performing their duties are paid an allowance at a specified percentage of their standard annual rates. See Clause 18.6 . *Proof of proficiency and accreditation required. Accreditation may require completion of Diploma or Advanced Diploma in Translation or Interpreting from approved provider.		32 Schedule B Schedule C	32 Schedule C Schedule H	Schedule B Schedule F	11 32 (see 32.5) Schedule F
Building and Construction General On-site	Certain categories of worker are defined according to whether they have completed a relevant trade apprenticeship or AQF equivalent; or if they hold specified trade certificate, diploma degree qualifications. See Schedule B . Minimum wages for apprentices and trainees are specified according to specified markers of progress along specified AQF levels. See Clause 19 and Schedule C .	Tradespeople holding specified trade certificate issued by the appropriate certifying authority and is required to act on that certificate in the performance of their duties are paid an allowance at a specified percentage of their standard hourly rate. See Clause 22.3(m) .	19 (see 19.7) Schedule B Schedule C	19 (see 19.7) Schedule B Schedule C	19 (see 19.7) Schedule B Schedule C		Schedule B
Business Equipment	Certain categories of worker are defined according to whether they hold specified certificate or diploma qualifications. See Schedule B .	None		Schedule B	Schedule B		Schedule B
Car Parking	Not applicable.	None	None	None	None	None	None
Cement and Lime	Not applicable.	None	None	None	None	None	None
Cemetery Industry	Certain categories of worker are defined according to specified markers of progress along specified AQF levels; or whether they hold specified trade certificates. See Schedule B .	None	Schedule B	Schedule B	Schedule B		

Children's Services	Certain categories of worker are defined according to specified markers of progress along specified AQF levels. See Schedule B . Minimum wage classification specified for employees who hold advanced diploma qualification (AQF Level 6 equivalent). See Clause 14 .	Certain categories of worker holding specified qualifications are paid an allowance at a specified percentage of their standard weekly rate. See Clause 15.6 .	Schedule B	Schedule B	Schedule B		14 (see 14.1) Schedule B
Cleaning Services	Not applicable.	None	None	None	None	None	None
Clerks - Private Sector	Certain categories of worker are defined according to whether they hold specified certificate qualifications. See Schedule B .	None		Schedule B	Schedule B		Schedule B
Coal Export Terminals	Certain categories of worker are defined according to whether they hold specified trade certificates or post-trade qualifications. See Schedule B .	None		Schedule B	Schedule B		
Commercial Sales	Not applicable.	None	None	None	None	None	None
Concrete Products	Certain categories of worker are defined according to whether they hold specified certificate or trade qualifications. See Schedule B .	None		Schedule B	Schedule B		
Contract Call Centres	Certain categories of worker are defined according to whether they hold specified diploma or certificate qualifications. See Schedule B .	None		Schedule B	Schedule B		Schedule B
Corrections and Detention (Private Sector)	Certain categories of worker are defined according to whether they hold specified AQF certificate qualification. See Schedule B , Schedule C and Schedule D .	None	Schedule D	Schedule B Schedule D	Schedule B Schedule C Schedule D		
Cotton Ginning	Certain categories of worker are defined according to whether they hold specified Certificates or trade qualifications. See Clause 13 .	None			13		
Dredging Industry	Not applicable.	Certain categories of worker holding specified certificates are paid an allowance at a specified percentage of their standard weekly rate. See Clauses 15.8-15.10 .			15		
Dry Cleaning and Laundry Industry	Not applicable.	None	None	None	None	None	None
Educational Services (Post-Secondary Education)	Certain categories of worker are defined according to whether they hold specified Postgraduate Degree, Degree, Graduate	None	4 (see 4.3) Schedule D	4 (see 4.3) Schedule B	Schedule C Schedule D	Schedule B Schedule C	Schedule B Schedule C

	Diploma, or Certificate qualification; or specified trade or post-trade qualifications. Qualifications are defined within the AQF. See Schedule B , Schedule C and Schedule D .			Schedule C Schedule D		Schedule D	Schedule D
Educational Services (Schools) General Staff	Certain categories of worker are defined according to whether they hold specified Postgraduate Degree, Degree, Graduate Diploma, or Certificate qualification; or specified trade or post-trade qualifications. Qualifications are defined within the AQF. See Schedule B .	None	Schedule B	Schedule B	Schedule B	Schedule B	Schedule B
Educational Services (Teachers)	Worker categories are defined according to whether they hold specified undergraduate or postgraduate Degrees; and teaching experience. See Clause 3 and Clause 13 .	None		clause 13		3 (see 3.1)	
Electrical, Electronic and Communications Contracting	Certain categories of worker are defined according to specified markers of progress along specified AQF levels; or whether they hold specified trade certificates or tradesperson's right certificates. See Schedule B .	None	Schedule B	Schedule B	Schedule B		Schedule B
Electrical Power Industry	Certain categories of worker are defined according to whether they hold relevant technical, post-trade or degree qualifications; or certificates at specified levels. Schedule B .	None		Schedule B	Schedule B	Schedule B	
Fast Food Industry	Not applicable.	None	None	None	None	None	None
Fire Fighting Industry	Certain categories of worker are defined according to whether they hold the Certificate of Proficiency or Advanced Certificate. See Schedule B .	Employees holding specified certificates are paid an allowance at a specified percentage of their standard weekly rate. See Clause 17.7 .			17 (see 17.7) Schedule B		
Fitness Industry	Certain categories of worker are defined according to whether they hold Fitness Industry AQF diploma, or certificate qualification at specified levels. See Schedule B .	None	Schedule B	Schedule B	Schedule B		Schedule B
Food, Beverage and Tobacco Manufacturing	Certain categories of worker are defined according to whether they hold specified AQF certificates at specified levels; or specified associate diploma or advanced certificate qualifications. See Schedule B .	Employees holding specified certificates and appointed work in a specified role are paid an allowance at a specified percentage of their standard weekly rate. See Clause 21.6(c) .	Schedule B Schedule D	Schedule B	Schedule B		Schedule B

	Minimum wages for trainees are specified according to specified markers of progress along specified AQF levels. See Schedule D .						
Funeral Industry	Certain categories of worker are defined according to whether they hold appropriate qualifications. See Schedule B .	None		Schedule B			
Gardening and Landscaping Services	Certain categories of worker are defined according to whether they hold specified trade or diploma qualifications; or certificate qualifications at specified levels. See Schedule B .	None		Schedule B	Schedule B		Schedule B
Gas Industry	Certain categories of worker are defined according to whether they hold relevant trade certificates or licences. See Schedule B .	None		Schedule B	Schedule B		
General Retail Industry	Certain categories of worker are defined according to whether they hold relevant certificate or trade qualifications. See Schedule B .	None		Schedule B	Schedule B		Schedule B
Graphic Arts, Printing and Publishing	Minimum wages and certain categories of worker are defined according to whether they hold specified certificate or trade certificate at specified levels. See Clause 17 and Schedule B . Minimum wages for apprentices and adult apprentices are specified according to specified markers of progress along specified AQF levels. See Clause 19 and clause 20 .	None		19 (see 19.2) 20 (see 20.3) 23 (see 23.3 & 23.4) Schedule B	17 (see 17.3 & 17.4) 19 (see 19.2) 20 (see 20.3) 23 (see 23.3 & 23.4) Schedule B		
Hair and Beauty Industry	Certain categories of worker are defined according to whether they hold specified diploma qualification or certificate qualification at specified levels. See Schedule B .	None			Schedule B		Schedule B
Health Professionals and Support Services	Minimum wages and certain categories of worker are defined according to whether they hold specified diploma, degree or postgraduate qualifications. See Clause 15 and Schedule B .	None		15 (see 15.2) Schedule B	Schedule B	15 (see 15.2)	Schedule B
Higher Education Industry - Academic Staff -	Certain categories of worker and pay rates are defined according to whether they hold specified undergraduate, graduate diploma	None		18 (see 18.2) schedule a			schedule a

	or postgraduate qualifications. See Clause 18 and Schedule A .						
Higher Education Industry - General Staff -	Certain categories of worker are defined according to whether they hold specified undergraduate or postgraduate qualifications or certificate qualification at specified levels. Qualifications are defined within the AQF. See Schedule B .	None	Schedule B (see definition 2: qualifications)	Schedule B	Schedule B	Schedule B	Schedule B
Horse and Greyhound Training	Not applicable.	None	None	None	None	None	None
Horticulture	Certain categories of worker are defined according to whether they hold specified trade qualifications. See Schedule B .	None		Schedule B			
Hospitality Industry (General)	Certain categories of worker are defined according to whether they hold specified trade qualifications or have completed a training course accredited by the AQF. See Schedule D . Relevant training qualification for school-based apprenticeships under this award must be an AQF Certificate Level III qualification. See Schedule G .	None	3 (see 3.1) Schedule D (see D.3.1) Schedule G (see G.12.2)	3 (see 3.1) Schedule D (see D.2.8) Schedule G (see G.12)	3 (see 3.1) Schedule D (see D.2.7) Schedule G (see G.12.2)		
Hydrocarbons Field Geologists	Certain categories of worker are defined according to whether they hold specified degree qualifications. See Schedule B .	Employees undertaking further training as agreed with their employer are reimbursed by the employer for all related costs. See Clause 15.3 .				Schedule B	
Hydrocarbons Industry (Upstream)	Certain categories of worker are defined according to whether they hold specified trade qualifications. See Schedule B .	Employees required by their employer to hold an Electrical Technicians licence* (or equivalent) are paid an allowance at a specified percentage of their standard weekly rate. See Clause 15.2(b) . *Requires completion of specified Certificate III course, minimum relevant work experience, or completion of an apprenticeship. Specific eligibility requirements differ by state.		Schedule B	Schedule B		
Joinery and Building Trades	Minimum wages for apprentices, adult apprentices and trainees are specified according to specified markers of progress along specified AQF levels. See Clause 19 and Clause 20 and Schedule D .	Tradespeople holding specified trade certificate issued by the appropriate certifying authority and is required to act on that certificate in the performance of their duties are paid an allowance at a	19 (see 19.1) 20 (see 20.2) Schedule D	19 (see 19.1) 20 (see 20.2) Schedule D	19 (see 19.1) 20 (see 20.2) Schedule D		

		specified percentage of their standard hourly rate. See Clause 24.3(p) .					
Journalists Published Media	Certain categories of worker are defined according to whether they hold appropriate diploma or degree qualifications. See Clause 13 .	None				13 (see 13.2)	13 (see 13.2)
Labour Market Assistance Industry	Not applicable.	None	None	None	None	None	None
Legal Services	Certain categories of worker are defined according to whether they hold appropriate TAFE or tertiary qualifications. See Schedule B .	None		Schedule B (see B.6)	Schedule B (see B.3 & B.4)		Schedule B (see B.5 & B.6)
Live Performance	Certain categories of worker are defined according to whether they hold appropriate trade, sub-trade or tertiary qualifications. See Schedule B .	None		Schedule B (see B.7 & B.10)	Schedule B		
Local Government Industry	Certain categories of worker are defined according to whether they hold appropriate trade and non-trade certificates or equivalent, or tertiary qualifications. See Schedule B .	None		Schedule B	Schedule B	Schedule B	Schedule B
Mannequins and Models	Not applicable.	None	None	None	None	None	None
Manufacturing and Associated Industries and Occupations	Classifications of cadets (see Clause 17), apprentice minimum wages and apprenticeship progression requirements (see Clause 25) are defined according to specified markers of progress along specified AQF levels. Certain categories of worker and employee minimum wages are defined according to whether they hold specified degree, diploma or certificate level qualifications. See Schedule B and Clause 24 . Minimum wages for trainees are specified according to specified markers of progress along specified AQF levels. See Schedule D and Clause 28 .	None	17 (see 17.2) 25 (see 25.7) Schedule B Schedule D	3 (see 3.1) 17 (see 17.1 & 17.2) 25 (see 25.3 & 25.7) 28 (see 28.3) Schedule B Schedule D	3 (see 3.1) 15 (see 15.5) 24 (see 24.1) 25 (see 25.7) 28 (see 28.1) Schedule B Schedule D	Schedule B (see B.2.1)	15 (see 15.5) 17 (see 17.1) 24 (see 24.1) 25 (see 25.3 & 25.7) 28 (see 28.3) Schedule B
Marine Tourism and Charter Vessels	Certain categories of worker and workers' minimum wages are defined according to whether they hold specified industry certificates. See Schedule B and Clause 13 .	Employees (who are not employed as MED*) required to hold specified MED certificates are paid an allowance at a specified percentage of their standard daily rate. See Clause 14.5 .		Schedule B	13 (see 13.3) Schedule B		

		*Marine Engine Driver.					
Marine Towing	Not applicable.	Certain categories of worker holding specified qualifications are paid an allowance at a specified percentage of their standard weekly rate. See Clause 16.1(c) .		16 (see 16.1) (allowances)			
Maritime Offshore Oil and Gas	Not applicable.	Certain categories of worker undertaking approved courses of study are paid 75% of their salary or aggregated wages (if the approved study occurs outside period of accrued leave) or given additional leave equivalent to 75% of the authorised period of study (if the approved study occurs during period of accrued leave). When applicable, living away from home allowance is paid at specified weekly rates during the authorised period of study. See Clause 14.7 .			14 (see 14.7) (allowances)		
Market and Social Research	Not applicable.	None	None	None	None	None	None
Meat Industry	Minimum wages for apprentices are specified according to specified markers of progress along specified AQF levels. See Clause 21 . Certain categories of worker are defined according to whether they hold specified trade or non-trade certificate qualifications. See Schedule B .	None	21 (21.7)	21 (21.7) Schedule B	21 (21.7)		
Medical Practitioners	Certain categories of worker are defined according to whether they hold specified higher qualifications and the number of years of postgraduate clinical experience. See Schedule A .	None		schedule a			
Mining Industry	Certain categories of worker are defined according to whether they hold a trade or dual trade qualification. See Schedule B .	Employees required by their employer to hold an Electrical Technicians licence* (or equivalent) are paid an allowance at a specified percentage of their standard weekly rate. See Clause 14.2(c) . *Requires completion of specified Certificate III course, minimum relevant work experience, or completion of an apprenticeship. Specific eligibility requirements differ by state.		Schedule B			

Miscellaneous	Minimum wages for apprentices are defined according to specified markers of progress along specified AQF levels. See <u>Schedule E</u> .	None	<u>Schedule E</u>	<u>Schedule B</u> <u>Schedule E</u>	<u>Schedule E</u>		
Mobile Crane Hiring	Certain categories of worker are defined according to whether they hold specified trade licenses. See <u>Schedule B</u> . Minimum wages for trainees are defined according to specified markers of progress along specified AQF levels. See <u>Schedule C</u> .	None	<u>Schedule C</u>	<u>Schedule B</u> <u>Schedule C</u>	<u>3 (see 3.1)</u> <u>Schedule C</u>		
Nursery	Certain categories of worker are defined according to whether they hold an accredited trade certificate. See <u>Schedule B</u> .	None		<u>Schedule B</u>	<u>Schedule B</u>		
Nurses	Certain categories of worker and minimum wages defined according to whether they hold certificate, degree or master degree qualifications. See <u>Schedule B</u> and <u>Clause 14</u> .	None		<u>14 (see 14.1)</u> <u>Schedule B</u>	<u>14 (see 14.1)</u> <u>Schedule B (see B.4.2)</u>	<u>14 (see 14.3)</u>	<u>Schedule B (see B.4.2)</u>
Oil Refining and Manufacturing	Certain categories of worker are defined according to whether they hold a trade or dual trade qualification. See <u>Schedule B</u> .	None		<u>Schedule B</u>			
Passenger Vehicle Transportation	Not applicable.	None	None	None	None	None	None
Pastoral	Certain categories of worker are defined according to whether they hold trade certificate qualifications. See <u>Clause 27</u> .	None		<u>27 (see 27.6 & 27.7)</u> <u>33 (see 33.8)</u>	<u>27 (see 27.6 & 27.7)</u> <u>33 (see 33.5 & 33.8)</u>		
Pest Control Industry	Certain categories of worker are defined according to whether they hold an accredited pest operator's certificate and license. See <u>Schedule B</u> .	None			<u>Schedule B</u>		
Pharmaceutical Industry	Certain categories of worker are defined according to whether they hold certificate qualifications. See <u>Schedule B</u> .	None			<u>Schedule B</u>		
Pharmacy Industry	Certain categories of worker are defined according to whether they hold certificate qualifications at levels III and IV, or an accredited degree qualification. See <u>Schedule B</u> .	None		<u>Schedule B</u>	<u>Schedule B</u>		

Plumbing and Fire Sprinklers	Certain categories of worker are defined according to whether they hold relevant certificate at specified levels, or trade certificate or equivalent. See Schedule B . Apprentices that completes a peak sports apprenticeship will obtain a trade qualification. See Schedule H .	Certain categories of worker holding specified trade registrations are paid an allowance at a specified percentage of their standard weekly rate. See Clause 21.1(d) . Certain categories of worker who is required by their employer to act on a trade licence, or to hold a specified trade certificate are paid an allowance at a specified percentage of their standard hourly rate. See Clause 21.5(a)(i) and Clause 21.5(b) . Note: trade registrations/licenses/certificates require completion of a Certificate III or an approved VET training course. Eligibility requirements differ by state.		21 (see 21.5) (allowances) Schedule B Schedule H (see H.6)	Schedule B		
Port Authorities	Certain categories of worker are defined according to whether they hold specified certificate or diploma qualifications. See Schedule B .	Certain categories of worker who hold and in the course of their duties may be required to use an unrestricted electrician's licence* are paid an allowance at a specified percentage of their standard weekly rate. See Clause 14.1(d) *Requires completion of specified Certificate III course, minimum relevant work experience, or completion of an apprenticeship. Specific eligibility requirements differ by state.		Schedule B	Schedule B		Schedule B (see B.8)
Ports, Harbours and Enclosed Water Vessels	Not applicable.	Employees who hold and is required to use a specified Certificate of Competency are paid an allowance at a specified percentage of their standard daily rate. See Clause 14.4 .			14 (see 14.4) (allowances)		
Poultry Processing	Not applicable.	None	None	None	None	None	None
Premixed Concrete	Not applicable.	None	None	None	None	None	None
Professional Diving Industry (Industrial)	Certain categories of worker are defined according to whether they hold a relevant trade qualification and familiarity with diving operations. See Schedule B . <i>Professional divers are certified in accordance with AS 4005.2—2000 and operate in accordance with AS/NZS 2299.3:2003</i>	None		Schedule B (see B10)			

Professional Diving Industry (Recreational)	Not applicable. <i>Professional divers are certified in accordance with AS 4005.2—2000 and operate in accordance with AS/NZS 2299.3:2003</i>	None	None	None	None	None	None
Professional Employees	Certain categories of worker are defined according to whether they hold a diploma or degree qualification in Science, Engineering or Information Technology. See Schedule B .	None		3 Schedule B (see B.1.2)		3 15	3
Quarrying	Not applicable.	None	None	None	None	None	None
Racing Clubs Events	Not applicable.	None	None	None	None	None	None
Racing Industry Ground Maintenance	Certain categories of worker are defined according to whether they hold a trade qualification. Apprentice is defined as an employee who is engaged under a training contract to complete a relevant qualification at AQF Certificate Level III or IV (where relevant). See Clause 13 .	None		13 (see 13.4 & 13.8)	13 (see 13.8)		
Rail Industry	Certain categories of worker are defined according to whether they hold certificate, trade or post-trade certificate, or associate diploma qualification (or equivalent). See Schedule A .	None		schedule a	schedule a		schedule a
Real Estate Industry	Not applicable	None	None	None	None	None	None
Registered and Licensed Clubs	Certain categories of worker are defined according to whether they hold specified AQF certificate qualifications. See Schedule C . Minimum wages for Management trainees are specified according to enrolment and completion of a nationally accredited Diploma of Hospitality Management qualification. See Clause 17 .	Certain categories of worker undertaking a specified course of study required by their employer are to be given leave to attend classes and examinations. Course fees are to be reimbursed by the employer at the successful completion of each year. See Clause 18.1(j) .	Schedule C	17 (see 17.9) Schedule C appendix to Schedule C	18 (see 18.1) Schedule C appendix to Schedule C		17 (see 17.9) Schedule C
Restaurant Industry	Minimum wages for certain classifications of worker are specified according to whether they hold AQF certificate qualifications. See Clause 3 and Clause 20 . Certain categories of worker are defined according to whether they hold specified trade certificates. See Schedule B .	None	3 (see 3.1)	3 (see 3.1)	3 (see 3.1) Schedule B (B.5.3)		

Road Transport and Distribution	Certain categories of worker are defined according to whether they hold relevant certificates. See Schedule B .	None			3 (see 3.1) Schedule B (see B.4)		
Road Transport (Long Distance Operations)	Not applicable.	None	None	None	None	None	None
Salt Industry	Certain categories of worker are defined according to whether they hold a trade certificate. See Schedule B .	None		Schedule B (see B.2.1)	Schedule B (see B.3.4)		
Seafood Processing	Not applicable.	None	None	None	None	None	None
Seagoing Industry	Not applicable. <i>The training, qualifications, roles and responsibilities of the classification of employees included in this award are incorporated in Australian Marine Orders—Part 3, the Navigation Act 1912 (Cth) and other relevant State Flag requirements.</i>	Certain categories of worker undertaking approved courses of study are paid 75% of their salary or aggregated wages (if the approved study occurs outside period of accrued leave) or given additional leave equivalent to 75% of the authorised period of study (if the approved study occurs during period of accrued leave). When applicable, living away from home allowance is paid at specified weekly rates during the authorised period of study. See Clause 14.6 .	None	None	None	None	None
Security Services Industry	Not applicable.	None	None	None	None	None	None
Silviculture	Certain categories of worker are defined according to whether they hold a trade certificate. See Clause 13 .	None			13 (see 13.3)		
Social, Community, Home Care and Disability Services Industry	Certain categories of worker are defined according to whether they hold a relevant or a specified certificate, advanced certificate or associate diploma qualification. See Schedule B (social and community services), Schedule C (crisis accommodation), Schedule D (family day care), and Schedule E (home care).	None		Schedule B Schedule C Schedule D Schedule E	15 (see 15.3) 17 (see 17.3) Schedule B Schedule C Schedule E	15 (see 15.3) 17 (see 17.5) Schedule B Schedule C Schedule E	15 (see 15.3) 17 (see 17.5) Schedule B Schedule C
Sporting Organisations	Certain categories of worker are defined according to whether they hold specified qualifications. See Schedule B .	None		Schedule B (see B.3.1 & B.3.3)			
State Government Agencies	Certain categories of worker are defined according to whether they have completed a relevant trade apprenticeship or AQF equivalent; or hold relevant advanced technical certificate, associate diploma,	None	Schedule B (see B.4.3)	Schedule B	Schedule B (see B.2.4)		Schedule B (see B.2.5 & B.2.6)

	diploma or tertiary qualification. See <u>Schedule B</u> .						
Stevedoring Industry	Not applicable.	<p>Certain categories of worker undertaking accredited training towards an appropriate post-trade certificate, which would justify reclassification to a higher pay grade, are paid an allowance at specified percentages of their current standard weekly rate upon partial completion of the certificate. See <u>Clause 14.2</u>.</p> <p>Employees required to obtain or maintain a license, trades certificate or other qualification by their employer are reimbursed for all associated costs. See <u>Clause 14.12</u>.</p> <p>Certain categories of worker who hold and in the course of their duties may be required to use an unrestricted electrician's licence* are paid an allowance at a specified percentage of their standard weekly rate. See <u>Clause 14.13</u>.</p> <p>*Requires completion of specified Certificate III course, minimum relevant work experience, or completion of an apprenticeship. Specific eligibility requirements differ by state.</p>		<u>14 (see 14.12)</u> (not relevant)	<u>14 (see 14.2 & 14.12)</u> (not relevant)		
Storage Services and Wholesale	Certain categories of worker are defined according to whether they hold relevant trade certificates. See <u>Schedule B</u> .	None			<u>Schedule B</u>		
Sugar Industry	<p>Certain categories of worker are defined according to whether they hold AQF qualifications at specified levels or equivalent. See <u>Clause 39</u>.</p> <p>Certain categories of worker are defined according to whether they hold specified certificate qualifications. See <u>Clause 37</u>.</p> <p>Competency based progression requirements for apprentices are outlined according to percentage completion of a relevant AQF III Certificate. See <u>Clause 40</u>.</p>	None	<u>39 (see 39.5)</u> <u>40 (see 40.8)</u> <u>Schedule D</u>	<u>37 (see 37.5)</u> <u>39</u> <u>40 (see 40.8)</u> <u>Schedule D</u>	<u>14 (see 14.1 & 14.2)</u> <u>37 (see 37.5)</u> <u>39</u> <u>40 (see 40.8)</u> <u>Schedule D</u>		

	Minimum wages for trainees are specified according to specified markers of progress along specified AQF levels. See Schedule D .						
Supported Employment Services	Certain categories of worker are defined according to whether they hold trade certificate qualification or equivalent. See Schedule B .	None		Schedule B	Schedule B (see B.5 & B.7)		
Surveying	Certain categories of worker are defined according to whether they hold relevant certificate, diploma, advanced diploma or degree qualifications. See Schedule B . Minimum wages for certain classifications of worker are specified according to whether they hold diploma or advanced diploma qualifications. See Clause 15 .	None		15 (see 15.5) Schedule B (see B.1)	Schedule B (see B.1)	Schedule B (see B.1)	15 (see 15.5) Schedule B (see B.1)
Telecommunications Services	Certain categories of worker are defined according to whether they hold specified certificate, diploma, or advanced diploma qualification. See Schedule B .	None		Schedule B	Schedule B		Schedule B
Textile, Clothing, Footwear and Associated Industries	Certain categories of worker are defined according to whether they hold a relevant trade certificate. See Schedule B .	None			Schedule B (see B.5 & B.10)		
Timber Industry	Certain categories of worker are defined according to whether they have partially completed an advanced diploma or associate diploma or an AQF National Certificate at specified level. See Schedule B (general timber). Certain categories of worker are defined according to whether they hold relevant trade certificate, trade recognition, certificate qualification at a specified level or diploma qualification. See Schedule C (wood and timber furniture). Employee progression requirements for certain classification streams specified according to whether employees have obtained specified certificate or trade certificate qualification under the Furnishing Industry Training Package. See Schedule C (wood and timber furniture).	None	Schedule B (see B.7.2)	Schedule B Schedule C	Schedule B Schedule C		Schedule B (see B.7.2) Schedule C (see C.8.3)
Transport (Cash in Transit)	Not applicable.	None	None	None	None	None	None

Travelling Shows	Not applicable.	None	None	None	None	None	None
Vehicle Manufacturing, Repair, Services and Retail	Certain categories of worker are defined according to whether they hold AQF National Certificate at specified levels. See Schedule B (vehicle industry repair services and retail) and Schedule C (vehicle manufacturing). Minimum wages for certain classifications of worker are specified according to whether they hold National Diploma or National Advanced Diploma qualification. See Clause 45 .	None	Schedule B (see B.7) Schedule C (see C.8.1)	45 (see 45.8) 58 (see 58.1) Schedule B (see B.7) Schedule C	Schedule B Schedule C		45 (see 45.8) Schedule C
Waste Management	Not applicable.	None	None	None	None	None	None
Water Industry	Certain categories of worker are defined according to whether they have completed Year 10 or secondary school, or hold certificate, trade certificate, post-trade certificate, diploma, advanced diploma or degree qualification. See Schedule B .	None		Schedule B	Schedule B	Schedule B	Schedule B
Wine Industry	Certain categories of worker are defined according to whether they hold certificate or diploma qualification; relevant recognised, or qualification; or appropriate qualification to the field of speciality. See Schedule B .	None		Schedule B	Schedule B		Schedule B (see B.4.5)
Wool Storage, Sampling and Testing	Certain categories of worker are defined according to whether they hold appropriate certification. See Schedule B .	None			“certification” Schedule B (see B.3.5 & B.3.15)		

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APPENDIX 4: SUMMARY OF NATIONAL AND REGIONAL QUALIFICATIONS FRAMEWORKS

I. Canada – Ontario

OVERALL SUMMATION

Does not offer any significant innovations in comparison with the AQF.

GOVERNANCE

Legislative framework relates only to degree level programs

The Canadian Degree Qualifications Framework was adopted in 2007 by provincial and territorial ministers responsible for postsecondary education in Canada. It is part of the overarching *Ministerial Statement on Quality Assurance of Degree Education in Canada*. In addition to the Canadian Degree Qualifications Framework, the statement outlines procedures and standards that provide general guidelines on assessing the quality of new degree programs and new degree-granting institutions.

The statement on processes for QA is a “guideline” to be used in decision making relating to new degree programs and new degree-granting institutions within a province/territory.

Administering agencies

Provincial governments.

Ontario is the only state/territory to have developed its own comprehensive qualifications. The Ontario Qualifications Framework includes all non-religious post-secondary certificate, diploma and degree programs offered under the auspices of the Province of Ontario including apprenticeship certificates, qualifications awarded by private career colleges and public colleges and degrees offered by public universities and institutions authorised to award degrees by consent of the Minister of Training, Colleges and Universities of Ontario.

National Policy objectives relate only to degree level programs

- To provide assurance to the public, students, employers, and postsecondary institutions nationally and internationally that new programs and new institutions of higher learning meet appropriate standards and that performance against the standards will be assessed by appropriate means
- To provide a context for identifying how degree credentials compare in level and standard to those in other jurisdictions, with a view to facilitating the search for continuous improvement, the education and training of an internationally competitive workforce, and international recognition of the quality of Canadian credentials
- To improve student access to further study at the postsecondary level by establishing a degree-level standards context in which policies on the transfer of credits and credential recognition may be developed and, in fairness to students who choose non-traditional providers, to focus discussion of credit transfer and credential recognition on the academic standards that the programs involved have met

Oversight of QA and compliance

Procedures and Standards for Assessing New Degree-Granting Institutions overseen by state and territory Ministries.

Extent of stakeholder involvement

None discussed

STRUCTURE OF THE NQF

Number of Levels: 13

Qualifications covered

Certificate 1 to 9 are post-secondary offered within the College system

Levels 10 – 13 are Bachelor's, Honours, Masters and Doctorate offered within the university system

Taxonomy design and Domain descriptors

The Framework is divided into two categories

- A. Qualification Descriptions which distinguish between levels of knowledge based on a continuum from mastery of particular established bodies of knowledge and skills to levels at the frontiers of knowledge. Each qualification is seen as a “reference point” along that continuum.

Qualification descriptions in terms of:

- Overall program design and outcome emphasis
- Preparation for employment and further study
- Typical duration
- Admission requirements
- Provider
- Qualification awarded

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- B. Qualification standards specify the generic competencies the holder of each qualification is expected to demonstrate with a focus on knowledge or skills transferable to the workplace or useful for further study

Descriptors for standards:

- Depth and breadth of knowledge
- Conceptual and methodological awareness/research and scholarship
- Communication Skills
- Application of knowledge

- Professional capacity/autonomy
- Awareness of limits of knowledge

Volume of learning / duration

Described in terms of expected 'instructional hours' for levels 1 to 9

Described in terms of semesters and credits for levels 10 to 12 and years for level 13

Foundation and enabling / non-formal informal validation/ credit transfer

Not mentioned

Ancillary policies

Not mentioned

II. China

OVERALL SUMMATION

China's intention to build a comprehensive all-levels (including schools) qualifications framework to aid international comparability should be noted for Australia's future plans.

It might be instructive to examine the Shanghai Credit Bank of Lifelong Learning⁵⁷.

Published details on China's qualifications system are fragmented and extremely complex. The system is extremely large, diverse, unlike the Western system in the main, and constantly evolving.

GOVERNANCE

Legislative framework

China plans to develop a national qualification system that covers all types of education at all levels and promotes the international comparability of qualifications. Currently Chinese law mandates a system of occupational classifications based on vocational skills standards and requires the implementation of the NVQCS. Vocational educational law stipulates that vocational education should meet current demands and all should include vocational qualifications and certification.

The national qualification system is composed of two systems: educational qualification (under the Ministry of Education) and occupational qualification (under Ministry of Human Resource and Social Security) systems. The Modern Vocational Education System Construction Plan (2014-2020) sets out a vocational education structure to ensure a smooth transition between secondary and higher levels and between vocational and academic tracks.⁵⁸

Administering agencies

China operates a national vocational qualifications certificate system which was introduced in 1993.
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NVQCS was devised by the Ministry of Labour and Social Security and includes a national examination conducted by approved assessment agencies.

There is a regulation on Academic Degrees of People's Republic of China (2004) which stipulates levels of academic degrees.

⁵⁷ <http://global.sou.edu.cn/academics/shanghai-academy-credit-transfer-and-accumulation-bank-for-lifelong-education/>

⁵⁸ <http://documents.worldbank.org/curated/en/216651508745207540/pdf/120583-WP-P150980-PUBLIC-China-NQF-summary.pdf>

China Academic Degrees & Graduate Education Development Center (CDGDC) is an administrative institution directly under the Chinese Ministry of Education which is responsible for researching the comparability of Chinese and foreign education qualifications, verifying Chinese credentials, maintaining the database for China's academic degrees and graduate education and evaluating Chinese graduate education programs and quality assuring China-foreign jointly run schools and programs. CDGDC has been appointed by the Ministry to design a national qualifications framework for China⁵⁹.

Policy objectives

China recognises a need to build a unified qualifications framework in order to strengthen international comparability and mobility.

- To allow national comparability, transparency of learning outcomes and credit accumulation and transfer capability and equality of access.
- To increase acceptance of qualifications by society and the labour market.
- To improve the quality of the labour force and the development of society and the economy.
- To strengthen the international competitiveness of the labour force in response to challenges of the knowledge-economy
- To promote nationwide lifelong learning.
- Provide choices to meet personal learning needs and career development
- Respect the learning outcomes of learners from non-formal settings
- Improve individual competence and avoid repeated and aimless learning

Oversight of QA and compliance

Because of the regional diversity of China it is difficult to stipulate a nationwide standard or qualifications framework that is universally acceptable, however work is progressing.

Extent of stakeholder involvement

Not stated

STRUCTURE OF THE NQF

Number of Levels

Within the NVQC there are two further categories:

- The Qualification Certificate for Professional and Technical Personnel (QCPTP)
- The Qualification certificate for skilled workers (QCSW)

⁵⁹ <http://www.nzqa.govt.nz/about-us/our-role/our-role-in-international-education/country-specific-recognition-arrangements/china/>

Within the educational qualifications system there are four levels: primary junior secondary, senior secondary and bachelors degree

Qualifications covered

The NVQC has five levels:

- 5 Primary worker certificate
- 4 Intermediate worker certificate
- 3 Advanced worker certificate
- 2 Technician certificate
- 1 Senior technician certificate

NVQC - Workers in “specialised industries” such as Medicine and Law undertake training at all five levels.

QCPTP - Professional and technical personnel – white collar workers undertake training at levels 1-3

QCSW - Skilled workers – blue collar workers – undertake training at levels 4 and 5

Taxonomy design/ Domain descriptors

Progresses from Level 5 independent routine work and basic skills to Level 1 complex, non-routine, specialised competence, mastery, problem solving, innovation.

Volume of learning / duration

Not stated. It is apparently possible for graduates of three year higher vocational institutions to continue their studies at four year regular universities if they pass standardised tests. They would be able to receive a Bachelor’s degree after 2 years of study at a four year university.

Foundation and enabling / non-formal informal validation/ credit transfer

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Lifelong learning is an important strategy in China’s education development agenda and intends that academic continuing education, professional training and community-based education are three key areas for establishing a comprehensive lifelong learning framework.

Several municipalities including Beijing and Shanghai operate a credit bank system for recognition of learning outcomes and a system of credit accumulation and transfer in continuing education. Different regions have established mechanisms for this eg Shanghai Credit Bank of Lifelong Education is operated by the Shanghai Open University.

To bridge formal education with “self-taught” learning the Ministry of Education has instructed several provinces and the Open University of China to develop new ways to apply the

recognition, validation and accreditation system of lifelong education credits to distance learning.

Ancillary policies

Ministry of Labour and Ministry of Personnel have published a series of policies and regulations that stipulate in detail the operation of vocational qualifications assessment.

III. Denmark

OVERALL SUMMATION

The Danish National Coordination Point offers a model for national coordination and information dissemination, potentially useful in expanding the options for facilitating RPL and lifelong learning⁶⁰.

Denmark offers a point of comparison and consideration for expanding the AQF into schooling although it seems to offer the same predicament that the 2010 iteration of the AQF posed in relation to overlap of secondary school certificates with VET qualifications⁶¹.

GOVERNANCE

Legislative framework

In 2009 the framework was adopted by the Ministries of Education; Science, Technology and Innovation; Culture; and Economic and Business Affairs. There is no specific legal act for the Danish NQF and it is implemented indirectly in higher education via the accreditation act and in other levels in educational orders.

The NQF covers all types and levels of qualification awarded and quality assured by public authorities.

Administering agencies

There is a National Coordination Point (NCP) located in the Danish Agency for Science and Higher education which also hosts the Denmark national academic recognition information centre (NARIC).

A major role for the NCP is to coordinate stakeholders' input as well as disseminate information to a wider public.

Policy objectives

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- Provides a comprehensive systematic overview of qualifications within the Danish system.
- Supports development of a transparent education, training and learning system “without dead ends”.
- Supports learners' progression irrespective of prior learning, age or employment status.
- Is considering opening up towards private and non-formal qualifications.

⁶⁰ <https://ufm.dk/en/education/recognition-and-transparency/transparency-tools/qualifications-frameworks/european-qualifications-framework/eqf-coordination-point>

⁶¹ <https://ufm.dk/en/education/recognition-and-transparency/transparency-tools/qualifications-frameworks/types-of-certificates-and-degrees/hardtableview>

Oversight of QA and compliance

The Danish NQF was evaluated in 2013 and is now a visible part of national education databases proving it to be an integrated part of the education and training landscape.

Mapping showed that a high number of certificates and qualifications operate outside and in parallel to the NQF.

The Danish Accreditation Institute is an independent authority within the State Administration and accredits all higher education institutions and higher education academic programs.

The Danish Evaluation Institute explores and develops the quality of schools, from day care to upper secondary through vocational colleges to universities and adult education. It is an independent state institution established under the Ministry of Education.

Extent of stakeholder involvement

Broad range of stakeholders and social partners such as employers are consulted in both development and implementation. Their role is seen as a precondition for implementation. Inclusion of certificates in the NQF is determined by trade committees which consist of representatives of the social partners and have a high degree of co-responsibility for objectives and content of the programs

STRUCTURE OF THE NQF

Number of Levels and Qualifications covered

There are 8 levels with a clear distinction between levels 1-5 and levels 6-8

Level 1 is a Leaving certificate for primary and lower secondary school (9th grade).

Level 2 is a Leaving certificate for primary and lower secondary school (10th grade).

Level 3 is a VET (journeyman's) certificate

Level 4 is an Upper secondary school leaving certificate; a certificate for two-year upper secondary program (higher prep exam); or a VET (journeyman's certificate).

Level 5 is a VET (journeyman's) certificate or an Academy profession degree.

Levels 6 is Bachelor degree, Professional bachelor degree and Diploma degree,

Level 7 is Masters and

Level 8 is PhD programs.

Taxonomy design

Levels 1 – 5 qualifications are referenced according to a ‘best fit’ principle based on overall judgement of the knowledge, skills and competences of a particular qualification type.

Levels 6-8 are referenced according to a principle of ‘full fit’ meaning that qualifications have to be fully accredited as meeting the legal requirements set by national authorities and complying with the qualifications framework for higher education

Domain descriptors

Descriptors are based on the EQF and Bologna descriptors and are theoretically as well as practically oriented. They are:

- Knowledge – type, complexity, predictability of situation in which it is mastered, and the degree of understanding to place knowledge in context.
- Skills – type, complexity of problem-solving and the task, communication that is required and complexity of the message.
- Competence – responsibility and autonomy covering the type and complexity of the context for action, cooperation and responsibility for one’s own and others’ work, complexity of cooperation and the ability to take responsibility for one’s own and others’ learning.

Besides the Domain descriptors the NQF also covers “Formal matters”:

ECTS

Admission requirements

Further education

Main institution type

Knowledge base ie business and professional, research based and research.

Volume of learning / duration

Not stated for levels 1-4

For higher education workload is stated in terms of European Credit Transfer System credits (ECTS) with 60 credits being roughly equivalent to a one year program

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Level 5	90 – 150 ECTS
Level 6	180-240 ECTS
Level 7	120 ECTS
Level 8	180 ECTS

Foundation and enabling / non-formal informal validation/ credit transfer

The NQF descriptors apply also to ‘supplementary qualifications’ which may be additions to a qualification, a module or an independent entity not relate to any other qualification as in adult education or continuing education.

A legal framework for validation of prior learning (VPL) has been in place since 2007 and requires that assessment of the validation application must be made by the qualification granting institution, although a range of other agencies and social groups such as career guidance services, employers, trade unions can be involved in compiling the necessary documentation. It is acknowledged that while the system supports VPL more commitment is called for from employers, social partners and key actors in education to be more strategic and give more priority to VPL activity. In 2016 the government launched a number of initiatives targeting refugees for VPL

Ancillary policies

It is required through the various qualifications certifying bodies that a statement of levels be added to qualifications awarded.

IV. England and Northern Ireland

OVERALL SUMMATION

Full implementation of the Regulated Qualifications Framework (RQF) will not occur until 2018. A schematic description of the RQF is not yet on the Ofqual website.⁶²

GOVERNANCE

Legislative framework

In 2015 the regulated qualifications framework for England and NI (RQF) replaced the qualifications and credit framework (QCF) and the national qualifications framework (NQF). The RQF covers all regulated academic and vocational qualifications.

The role of the RQF is to provide a transparent description of existing qualifications and their interactions, not to regulate them.

Qualifications are regulated by:

- Office of Qualifications and Examination regulation (Ofqual) in England and
- Council for Curriculum Examinations and Assessment Regulation (CCEA) in Northern Ireland.

Administering agencies

Administration of the RQF is the responsibility of Ofqual.

Policy objectives and oversight of QA and compliance

The RQF is used to set qualification design rules and consistent measures of size and level of difficulty. Ofqual general conditions of recognition set a wide range of requirements and will replace the previous regulatory functions set by QCF. This is part of a policy to devolve responsibility to awarding organisations and providers so that “high quality vocational qualifications can be designed around the needs of employers, rather than fitting to prescriptive rules”.

Extent of stakeholder involvement

⁶² <https://www.gov.uk/government/organisations/ofqual>

A consultation on the proposed RQF was mounted in 2015 and 119 responses were registered. It was developed by the regulatory agencies in England, Scotland and Wales.

STRUCTURE OF THE NQF

Number of Levels

The RQF has 8 levels plus 3 entry levels. Levels 5 to 8 are equivalent to those used by the Framework for Higher Education Qualifications (FHEQ).

Qualifications at any level can be different from one another in their content and purpose. Most are assigned to a single level but some such as the GCSEs can span more than one

Qualifications covered

Each level has between 4 and 15 different award titles associated with it, for example at level 8 it is possible to receive a doctorate, a level 8 award, certificate and diploma.

Domain descriptors

The RQF operates with only two descriptors: Knowledge and skills

Volume of learning / duration

Important concepts in the RQF are “guided learning hours” and “total qualification time”

Guided learning hours (GLH) is made up of activities completed under direct supervision whether through physical presence or electronic.

Total qualification time is made up of GLH plus all other time taken in preparation or private study.

TQT is indicated for all qualifications. The credit value of a qualification is TQT divided by 10. These will be assigned to each qualification in the RQF to be released in January 2018.

Foundation and enabling / non-formal informal validation/ credit transfer

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RPL is used in all formal regulated qualifications to determine entry and exemptions.

Progress through non-regulated learning can be recognised through a five stage process (recognising and recording progress and achievement RARPA) although it does not lead to certification.

National vocational qualifications can validate workplace learning.

There is no system in place to coordinate validation activities taking place in the different sectors. And no specific national strategy devoted to RPL

V. Finland

OVERALL SUMMATION

The NQF is new and most of its details are embedded in legislation for which English translations were not able to be found.

The descriptor domains provide an interesting model for greater engagement of the framework with social policy objectives such as entrepreneurship

GOVERNANCE

Legislative framework

Finland passed the Act on a national framework for qualifications and other competence models in 2016 and it came into force in January 2017 and is under the jurisdiction of the Ministry of Education. It does not yet cover the full range of qualification offered outside the jurisdiction of the Ministry of Education. Statutory regulations on the level descriptors, positioning of qualifications, syllabi and competence modules are enacted by the Government Decree.

The legal framework explicitly underlines the NQF role as a tool for development and recognition of non-formal and informal learning.

Administering agencies

Ministry of Education and the Finnish National Agency for Education acts as the EQF national coordination point

Policy objectives

- The NQF aims to improve the transparency and consistency of outcomes-based qualifications across the spectrum of general, vocational education and training, and higher education.
- It allows for the inclusion of 'competence modules' or part qualifications in areas where there is a need for additional post-basic certification and specialisations as part of furthering the development of the 'lifelong learning landscape'.
- The framework is used explicitly as a tool for improvement in both quality and relevance of qualifications.

Oversight of QA and compliance

There are national quality assurance agencies at various levels

Extent of stakeholder involvement

Stakeholder involvement in development of the NQF was extensive and active despite numerous changes of government during the process.

STRUCTURE OF THE NQF

Number of Levels and Qualifications covered

There are 8 levels:

Level 1	Not described on the framework website
Level 2	Basic education syllabus
Level 3	Not described on the framework website
Level 4	General upper secondary school syllabus and matriculation exam Upper secondary vocational qualifications and further vocational qualifications, Basic Examination in Prison Services, Fire Fighter Qualification, and Emergency Response Centre Operator Qualification
Level 5	Specialist vocational qualifications eg air traffic control
Level 6	Bachelors degrees at universities and universities of applied sciences
Level 7	Masters degrees at universities and universities of applied sciences
Level 8	Licentiate and doctoral degrees, specialist degrees in veterinary medicine, specialist training in medicine and dentistry

Taxonomy design

Insufficient information available in English

Domain descriptors

Domain descriptors across all levels explicitly address policy objectives and national development priorities.

- Knowledge
- 158 of 209 Work method and application (skills)
- Responsibility, management and entrepreneurship
- Evaluation
- Key skills for lifelong learning

The different columns usually adopted for the descriptors are replaced by an integrated column summarising the requirements for each level which is said to be more in line with the way learning outcomes are written in Finland.

Volume of learning / duration

Not able to be found in English

Foundation and enabling / non-formal informal validation/ credit transfer

There is a longstanding principle that candidates without formal training background can be assessed for a qualification and VET qualifications give access to all forms of higher education.

Validation in competency-based VET is well established and steered by detailed legislation and policies as well as quality assurance mechanisms. Validation arrangements for international qualifications and higher education are also well established through national measures, legislation and development projects.

Ancillary policies

Not available in English

VI. France

OVERALL SUMMATION

The French NQF is dated and recognised to be overdue for significant revision.

The main lesson to be taken from the French experience is the need to manage the risk of inertia associated with deep integration between qualifications frameworks and occupational classifications and awards

GOVERNANCE

Legislative framework

The French NQF covers all vocationally and professionally oriented qualifications, including all higher education qualifications that have a vocational and professional orientation and purpose. The current NQF has its origins in 1969 and is not easily changed because of its industrial ramifications in relation to job classifications and salary levels.

A proposal for revision of the five level structure and its descriptors strengthens the labour market and competence focus but it is not clear whether this proposal will be adopted.

France has less distinction between VET and higher education than most other countries in Europe with considerable two way overlap between the two.

Qualifications from general education including primary and secondary school education are not covered.

Administering agencies

The Ministry of Higher Education oversees Diplomas, Bachelors and Masters qualifications many of which are offered by schools run by different Ministries and agencies such as chambers of commerce

^{160 of 209} Policy objectives

- Transparency
- Employability

Oversight of QA and compliance

The National Committee on Vocational Qualifications must approve any qualification which seeks to be added to the National Register. Criteria for registration are similar in scope to those applied by TEQSA.

Extent of stakeholder involvement

Extensive, through membership of the National Committee on Vocational Qualifications.

STRUCTURE OF THE NQF

Number of Levels and Taxonomy design

There are five levels each of which has a definition and a broad statement of learning outcomes. For example:

Level 1 is defined as Personnel holding jobs normally requiring a level of training above that of a master degree and the learning outcome is described as “[a]s well as confirmed knowledge of the fundamental scientific principles for vocational activity, a level 1 qualification requires mastery of design or research processes”.

Foundation and enabling / non-formal informal validation/ credit transfer

All qualifications entered on the National Register must be able to be obtained through validation of non-formal and informal learning.

The French VAE (trans: validation of acquisition of experiences) allows any French educational institution to grant degrees partly or completely based on work experience as evidenced in a portfolio. There are 1300 qualifications registered on the National register that are accessible via VAE. The system is very well developed but is demanding especially for candidates with lower levels of skill and qualifications.

Ancillary policies

Not available in translation.

VII. Germany

OVERALL SUMMATION

Germany offers a good example of an expanded set of policy objectives for the NQF that Australia might consider around skills orientation and support for validation of non-formal and informal learning.

From the AQF perspective the most significant innovation the DQR offers is the possibility to link VET and higher education qualifications at the same level such that lateral mobility or joint curricula are facilitated⁶³.

GOVERNANCE

Legislative framework

Official status conferred by a joint resolution of the Standing Conference of the Ministers for Education and Cultural Affairs, the Federal Ministry of Education and Research, the conference of Ministers for Economics and the Federal Ministry of Economics and Energy. No other form of legal regulation is planned.

Achievement of a reference level has not been considered in conjunction with implications for wages and the Law on Remuneration.

Administering agencies

The B-L-KS is the national coordination point for the EQF and is in charge of implementation of the DQR. It has 6 members including representatives of various ministries.

Policy objectives

The objectives of the DQR are:

- To increase transparency in qualifications and aid recognition elsewhere in Europe
- 162 of 209 • Support mobility of learners and employees
- Improve visibility of equivalence and differences between qualifications and promote permeability
- Promote reliability, transfer opportunities and quality assurance
- Increase skills orientation of qualifications
- Reinforce learning outcomes orientation
- Improve validation and recognition of non-formal and informal learning
- Encourage and improve access to lifelong learning

⁶³ www.dqr.de (requires translation from the German).

Oversight of QA and compliance

B-L-KS monitors allocation of qualifications to ensure consistency in the overall DQR structure. The DQR is used in the academic sector for development of accreditation procedures.

Extent of stakeholder involvement

Social partners, labour markets and business organisations have played a fundamental role in development of the framework through the DQR working group which also included education providers, researchers, practitioners.

STRUCTURE OF THE NQF

An important principle of the DQR is that each qualification level should always be accessible via various education pathways.

The overall structure is underpinned by a German conceptual approach referring to “the ability to act”.

Number of Levels and Qualifications covered

General education is not yet linked to the German qualifications framework for lifelong learning (DQR) and it does not yet include all formal qualifications. It does include most VET and higher education qualifications.

The DQR has 8 levels which differs significantly from most NQFs in that there is a significant degree of overlap of VET and higher education qualifications, with VET qualifications extending from level 1 through 7. For example, Level 6 encompasses both Bachelors and Master craftsman qualifications. There have been discussions about development of joint curricula at DQR Level 5 with the aim of aiding two way permeability between VET and higher education sectors especially in disciplines such as IT.

Level 1	Vocational training preparation
Level 2	Vocational training preparation, introductory training for young people, basic vocational training, full-time vocational school
^{163 of 209} Level 3	Dual VET (2 year training courses), completion of year 10 secondary in full-time vocational school
Level 4	Dual VET 3-3.5 year), full-time vocational school (assistant occupations)
Level 5	IT specialist (certified), service technician (certified)
Level 6	Bachelor, certified business specialist, certified mastercraftsman, certified operative IT professional, other VET according to Vocational Training Act (VTA)
Level 7	Master, certified strategic IT professional, other VET according to VTA
Level 8	Doctoral studies

Taxonomy design

The DQR differentiates between two categories of competence: professional and personal. Each level descriptor includes a statement of level indicators, a structure of requirements and a definition of the professional and personal competence outcomes.

Professional competence includes:

Knowledge – breadth and depth

Skills – instrumental and systemic skills, judgement

Personal competence includes:

Social competence – team/leadership skills, involvement and communication

Autonomy – autonomous responsibility, responsibility, reflectiveness and learning competence

Domain descriptors

Most recent version available in English 2011. Not significantly different in terminology from AQF.

Volume of learning / duration

Not available in English

Foundation and enabling / non-formal informal validation/ credit transfer

While various certificates at foundational and enabling level are available they are not yet incorporated into the DQR. Providers of continuous training and those who provide training for at risk groups see opportunities to become part of the integrated system and offer better progressions possibilities. The number of learners in the “transitional sector” is increasing.

Legislation is in place for validation of non-formal and informal learning within the VET sector including an external students’ examination. There is also a Vocational Qualifications Recognition Act that provides the right for individuals to have foreign acquired qualifications matched to German qualifications.

A pilot project ValiKom is a reference project to set up a validation system in Germany addressing adults who acquire skills and competencies through work but lack a formal qualification. The target is lower qualified workers and refugees. Several other projects are also in place to develop methods for validation at all levels.

Ancillary policies

The DQR is a non-regulatory framework and its integration into policies of different education sectors is evolving.

VIII. Hong Kong SAR, China

OVERALL SUMMATION

The HKQF is fundamentally different from the QF in the linkages between qualifications levels and titles. It is not comparable.

The terminology and conceptual basis of the levels descriptors is not fundamentally divergent from most QFs including the AQF and offers no innovative features.

GOVERNANCE

Legislative framework

HKQF launched by the Education Bureau (EDB) of the Hong Kong Special Administrative Region Government.

Administering agencies

The Qualifications Framework Secretariat (QFS) is the executive arm of the EDB and is responsible for implementing and promoting the HKQF.

Policy objectives

To:

- Define competency standards required of practitioners in different industries
- Ensure quality of qualifications and enable access to recognised qualifications through education and training or RPL
- Ensure that providers and the public understand the qualifications available and how they can contribute to improving workforce skills
- Delineate links between different types and levels of qualifications
- Recognise existing competencies through an RPL mechanism

^{166 of 209} • Simplify and standardise use of award titles

- Specify size/volume of learning through QF credit

Oversight of QA and compliance

The Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ) is an independent statutory body responsible for developing and implementing the standards and approach for accreditation of qualifications to underpin the HKQF and is the Qualifications Register Authority. The Qualifications Register is freely available on the web for public information.

Extent of stakeholder involvement

A discussion paper and series of consultations was held with industries, employers, trade unions, and professional bodies prior to the framework launch in 2008.

Cross-industry training advisory committees play a pivotal role in implementation and development of specification of competency standards. They comprise representatives of the training sector, industry, professional groups and government bureaus.

STRUCTURE OF THE NQF

The HKQF is referenced to the EQF, the Scottish Credit and Qualifications Partnership (SCQFP), NZ Qualifications Authority and Thailand Professional Qualifications Institute.

Number of Levels

The HKQF has 7 levels

Qualifications covered

A choice of award titles is available at 6 of the 7 levels with some stipulations (see below)

Doctorate	Level 7
Master and PG Diploma/ Certificate	Level 6
Bachelor	Level 5
Associate and Higher Diploma/Certificate	Level 4
Professional Dipl/Cert and Advanced Dipl /Cert	Level 4-6
Diploma	Level 3-6
Certificate	Level 1-6
Foundation Certificate	Level 1-2

The Award Titles Scheme stipulates that:

- Certificate titles may be awarded for levels 1 to 6
- Levels 1 and 2 may also be titled foundation certificates
- Diploma can only be used for levels 3 to 6 and must comprise 60 or more credits.

Taxonomy design

The HKQF has three key features:

- level reflecting the outcome standards, ie depth and complexity
- award title reflecting the level
- credit which indicates volume of learning

Domain descriptors

Generic level descriptors specify in four domains the outcome standards expected of the qualifications at each level. The four domains are:

- Knowledge and intellectual skills
- Processes
- Application, autonomy and accountability
- Communications, IT and numeracy

The terminology used in the descriptors is comparable with AQF.

The HKQF, specifies foundation generic competencies from Level 1 to 4 covering four strands of generic skills English, Chinese, IT and numeracy. This specification of general competencies (SGC) also aids secondary school as a useful reference for applied learning courses in the school curriculum.

Volume of learning / duration

The credit value assigned to a program is the estimated total hours involved by the learner to achieve the learning outcomes specified for the program as the rate of on QF credit point for each 10 hours.

Foundation and enabling / non-formal informal validation/ credit transfer

A credit accumulation transfer system helps learners accumulate credits from diverse course and convert them into a recognised qualification. One QF credit is 10 notional learning hours in any learning mode.

Industry training advisory committees determine which industries will establish RPL for non-formal and informal learning in the workplace and successful applicants are awarded a statement of attainment (QF level 1 to 4).

Ancillary policies

See the website for a large array of guidelines and explanatory manuals⁶⁴.

⁶⁴ <https://www.hkqf.gov.hk/en/home/index.html>

IX. India

OVERALL SUMMATION

The Indian NSQF is focused solely on general and TVET and has a strong emphasis on portability and mobility through the system.

Because of its explicit national skill development imperative it is useful to consider the NSQF policy objectives, particularly (i), (ii), (iii), (ix). They could generate ideas for greater usefulness of the AQF as a tool for workforce planning and mobility through and across various levels of non-formal and informal work experience.

GOVERNANCE

Legislative framework

The National Skill Qualification Framework (NSQF) applies only to general and technical and vocational education and training.

It is established under the Ministry of Skill development and Entrepreneurship

Administering agency and oversight of QA and compliance

Administered by the National Skill Development Agency (NSDA).

Policy objectives

- i. Making quality vocational education and training attractive to both young people and employers
- ii. Ensuring both vertical and horizontal pathways are available to the skilled workforce for further growth
- iii. Providing seamless integration of skill training with formal education
- iv. Focus on outcomes-based approach
- v. Increase capacity and quality of training infrastructure
- vi. Align workforce needs with skills training
- vii. Promote national standards in skills training
- viii. Quality assurance aligned with international standards
- ix. Providing vertical growth pathways in the general education system so that skills training is seen as a valid pathway to degrees and diplomas

Extent of stakeholder involvement

Industry, training providers and government agencies

STRUCTURE OF THE NQF

Number of Levels and Taxonomy design

There are 10 levels in the NSQF with level 10 representing the highest. The levels are not tied to qualifications titles.

For each job role and level the Qualifications Packs and National occupational Standards are formulated by the concerned industry through sector skill councils.

Qualifications covered

N/A

Domain descriptors

Each level is defined by descriptors in the following categories of competencies:

- i. Professional knowledge
- ii. Professional skill
- iii. Core skills: generic capabilities (language, numeracy, hygiene, cultural awareness) and interpersonal skills
- iv. Responsibility: the degree of supervision the person needs while doing the job or the degree of supervision they are capable of providing

Volume of learning / duration

Not stated

Foundation and enabling / non-formal informal validation/ credit transfer

The NSQF is designed to facilitate maximum permeability and recognition of non-formal learning.

Ancillary policies

X. Indonesia

OVERALL SUMMATION

The Indonesian Qualifications Framework is in the early stages of development and has no immediate lessons for the AQF.

GOVERNANCE

Legislative framework

The Indonesian Qualifications Framework (IQF) has legal endorsement in the form of a Presidential decree. It is also legally endorsed in the context of other laws and regulations pertaining to manpower development, national job training system and national education system and manpower quality and development and competence certification.

Administering agencies

Three ministries have been responsible for developing the IQF: Ministry of education and Culture; Ministry of Manpower, Ministry of Research, technology and Higher Education.

Within each of these ministries it has been administered by a number of Directorate- General departments according to the level of the education involved (school, VET, higher education).

The Indonesian Qualifications Board will manage the development of the IQF such as regulations, descriptors, guidelines, standards, coordination with other agencies.

There is currently consultation on the establishment of IQF governance arrangement

Policy objectives

- To increase quantity and quality of manpower to obtain greater access to national and international job markets.
- To increase contribution of learning outcomes to national economic growth, whether gained through formal, non-formal or informal education or work experience.
- To increase educational mobility to foster collaboration with international higher education institutions
- To increase awareness of Indonesia regionally and internationally without losing sight of national identity and character
-

Oversight of QA and compliance

Systems for quality assurance are still under development.

Extent of stakeholder involvement

Mainly under development by government departments.

STRUCTURE OF THE NQF

Number of Levels

There are nine levels characterised by both learning outcomes and job-specific competencies.

Taxonomy design

The Framework is complex with an academic stream from general high school through to PhD, a competence-based stream from vocational high school through to fully trained, levels of professional and specialist advanced training and job career pathways in training/non-formal education programs.

Domain descriptors

Descriptors at each level specify learning outcomes or competencies for that level and are divided into two categories general and specific:

General descriptors cover spirituality, personality, working attitude and ethics and are applicable to every citizen at every level.

Specific descriptors describe each individual's knowledge and skills and are level specific

The descriptors are unremarkable.

Volume of learning / duration

Not specified in the framework.

Foundation and enabling / non-formal informal validation/ credit transfer

In the early stages of development a credit transfer scheme has been designed to improve mobility across education streams with built in bridging programs

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Ancillary policies

Not available

XI. Ireland

OVERALL SUMMATION

The Irish qualifications framework (NFQ) is a good example of a framework that incorporates foundation studies via the medium of awards from the agency (Quality and Qualifications Ireland) that manages the NFQ and also maintains a directory of programs that it has validated⁶⁵.

The provision for four classes of award at most levels – major, minor, supplemental and special purpose allows the framework to recognise all types and volumes of learning achieved by a learner. The modular content of awards, potentially provided by several different accredited providers (see the directory of validated programs) especially up to level 7 is also emphasised and facilitates the ability for self-paced and self-designed learning programs.

The beginnings of a national approach to recognition of prior learning through establishment of a RPL practitioner network and steering committee may offer some ideas for the Australian context.

GOVERNANCE

Legislative framework, administration and oversight of QA and compliance

The Irish national framework of Qualifications (NFQ) was developed by the National Qualifications Authority of Ireland supported by the two main awarding bodies- Further Education and Training Awards Council and Higher education and training Award Council.

Quality and Qualifications Ireland, an agency established under the Qualifications and Quality Assurance (Education and Training) Act is responsible for the management, further development and promotion of the NFQ. QQI also validates and maintains a database of programs offered by a wide range of community and industry providers that it has approved for all levels of the framework⁶⁶. QQI's website provides 22 policies detailing its approach to accreditation and quality assurance, although the Cedefop (Vol II, p.267)⁶⁷ inventory of 17 qualifications frameworks notes that a key area that Ireland needs to address is "implementation of an integrated and effective quality assurance process for learning outcomes referenced qualifications, operating across institutions, sectors and levels".

Policy objectives

⁶⁵ <http://www.nfq-qqi.com/>

⁶⁶ <http://qsearch.qqi.ie/WebPart/Search?searchtype=programmes>

⁶⁷ <http://www.cedefop.europa.eu/en/publications-and-resources/publications/2222>

The NFQ is seen as an enabler of institutional reform and further policy development in education, training and qualifications. It was conceptualised as a driver of systemic change towards the objective of lifelong learning but is, in reality viewed as an enabler of wider reform in setting standards and program design.

The NFQ aims to:

- Develop more flexible and integrated system of qualifications that would recognise all learning
- Establish learning outcomes as a common reference point and for recognition of non-formal and informal learning
- Responding to qualifications needs of individuals, society and economy through a range of qualifications and recognition of diverse forms of learning

The new *National skills strategy: Ireland's future*⁶⁸ published in 2016 includes among its objectives the development of a system of RPL and better recognition of workplace learning supporting lifelong learning.

Extent of stakeholder involvement

QQI is at the centre of the qualification system and cooperates with ministries, higher education institutions, employers and the voluntary sector. The QQI Board includes 10 members of whom 2 must represent learners, operational subcommittees are comprised of experts and stakeholder consultation and knowledge-sharing plays an essential role.

STRUCTURE OF THE NQF

Number of Levels, qualifications covered and volume of learning

The NFQ has 10 levels covering all learning from initial to the most advanced:

Level 1 and 2	Certificates designed to meet needs of learners with no previous qualifications and special needs groups. They are mostly basic literacy and numeracy and in modular form which can be self-paced.
Level 3 174 of 209	Certificate 3 and Junior School Certificate provide recognition for specific knowledge, personal and practical skills that can be transferable to a variety of progression options.
Level 4 and 5	Certificate 4 and 5 and School Leaving Certificate provide recognition for achievement of vocational and personal skills knowledge and understanding to specified level and relevant to a variety of progression options, including employment at introductory level and progression to level 5 programs.

⁶⁸ https://www.education.ie/en/Publications/Policy-Reports/pub_national_skills_strategy_2025.pdf

Level 6	<p>Advanced Certificate is studied via various modules and enables a comprehensive range of skills for independent work or progress to higher education.</p> <p>Higher Certificate is normally awarded after completion of 2 years study (120 ECTS credits). Entry is generally for school leavers and allows progression to level 7 study.</p>
Level 7	<p>Ordinary Bachelor degree awarded after completion of 180 ECTS credits. Does not guarantee entry to Level 8</p>
Level 8	<p>Honours Bachelor degree normally 180-240 credits available to school leavers or those who complete an additional year after level 7 award.</p> <p>Higher Diploma awarded after completion of 60 ECTS credits. Entry is from Honours Bachelor or Ordinary Bachelor and is typically a different field of learning than the initial award.</p>
Level 9	<p>Masters degree – taught Masters awarded following completion of 60-120 ECTS credits. Research Masters typically 120 ECTS credits</p> <p>PG Diploma awarded after completion of 60 ECTS credits. Entry is from Level 7 or 8.</p>
Level 10	<p>Doctoral degree minimum requirement for entry is Honours Bachelors and normally 3 – 4 years duration (ECTS only given for taught elements).</p> <p>Higher Doctorate recognises excellent and distinguished contributions and is never based on a provider’s program. Not subject to validation and rests on recommendation of the awarding institution.</p>

Taxonomy design

The taxonomy includes the awarding institutions.

- Quality and Qualifications Ireland makes awards in further and higher education and training across the full 10 levels of the framework. It is the only body that confers awards at certificate level 1-5 and Advanced Certificate level.
- The State Examinations Commission makes school awards at levels 3, 4 and 5.
- ^{175 of 209}Thirteen Institutes of technology make awards from level 6 to 10 with some of them restricted to levels 6 to 8.
- Seven universities make awards from level 7 to 10.

Within each level from 4 to 10 awards may be:

- Minor for partial completion of the outcomes of a major award
- Supplemental for learning that is additional to a major award
- Special purpose for relatively narrow or purpose specific achievement

Domain descriptors

Domain descriptors (among other criteria) are specified in the application for validation paperwork. The Domains are:

- Knowledge: breadth and kind
- Know-how and skill: range and selectivity
- Competence: context, role, learning to learn and insight

Foundation and enabling / non-formal informal validation/ credit transfer

The NFQ has 2 levels which can be considered foundational and a number of programs that would enable access to higher levels.

QQI has a statutory obligation to establish updated policies for access, transfer and progressions including RPL. A national RPL practitioner network has been established to coordinate validation developments across sectors and the Department of Education and Skills is considering establishment of a national steering group for RPL.

ANCILLARY POLICIES

Quality Assurance Guidelines⁶⁹

Validation policy and criteria⁷⁰

⁶⁹<http://www.qqi.ie/Downloads/Quality%20Assurance%20Guidelines%20FET%202013.pdf#search=quality%20assurance%20guidelines%2A>

⁷⁰<http://www.qqi.ie/Downloads/HET%20Core%20Validation%20Policy%20and%20Criteria%20-%20Revised%202013.pdf#search=validation%20policy%20and%20criteria%2A>

XII. Malaysia

OVERALL SUMMATION

The 2017 draft version of the MQF is closely aligned with other international frameworks including the AQF.

The level descriptors provide a more “socially conscious” set of learning outcomes and, although some may be culturally specific, are worthy of consideration if the AQF wishes to broaden its social policy objectives to place more emphasis on inter-cultural awareness, ethics and entrepreneurship.

GOVERNANCE

Legislative framework

The Malaysian Qualifications Agency Act 2007 is the relevant legislation. The MQF covers all sectors and includes all levels of qualifications offered by all education and training institutions, professional bodies and other higher education institutions in the public and private sectors.

The MQF learning outcomes correlate with the National Education Philosophy and the Malaysia Education Blueprint 2015-2025.

Administering agencies

The MQF is administered by the Malaysian Qualifications Agency (MQA) with the involvement of the Ministry of Higher Education and the Ministry of Human Resources.

The Malaysian occupational skills qualifications framework is administered by the Department of Skill Development, Ministry of Human Resources.

Policy objectives

To:

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- Secure qualifications standards and reinforce policies on quality assurance
- Promote accuracy and consistency of nomenclature
- Provide mechanisms for progression and interrelation including non-degree and degree qualifications
- Encourage collaboration between public and private sector higher education providers and skills training providers
- Encourage parity of esteem among academic, professional, technical, vocational and skills qualification
- Establish a credit system to promote credit accumulation and transfer

- Provide clear and accessible public information on programs or qualifications in higher education
- Promote presentation of qualifications in forms that aid their evaluation by key stakeholders
- Detail links with qualifications outside Malaysia

Oversight of QA and compliance

MQA is responsible for accreditation and quality assurance of TVET and higher education qualifications, for the recognition and articulation of qualifications and for maintaining the Malaysian Qualifications register. Accreditation is not compulsory according to the Act but it is actually made mandatory by other regulations and policies thus ensuring compliance with MQF.

Extent of stakeholder involvement

Not explicitly stated.

STRUCTURE OF THE NQF

The MQF is benchmarked against the AQRF, AQF, NZQF, NQF of South Africa, EQF, Scottish Credit and Qualifications Framework.

Number of Levels and Taxonomy design⁷¹

The framework applies to post-secondary qualifications within the public and private higher education and technical and vocational education (TVET) system offered by polytechnics, community colleges, vocational colleges, skills training organisations and universities.

School based qualifications are considered as entry qualifications and “may equate to Level 3 and 4 and this is subject to further verification” (p.18).

There are 8 levels based on the expected learning outcomes in terms of:

- Depth, complexity and comprehension of knowledge
- Application of knowledge and skills
- The scope of communication/personal skills, information and technologies skills and numeracy skills
- The degree of autonomy and responsibility
- Breadth and sophistication of practices
- Scope and complexity of application

Qualifications covered

Levels 1 -3 Certificates

⁷¹ MQA MQF Version 2.0 Draft, March 2017.

Levels 4-5	Diploma and Advanced Diploma
Level 6	Bachelor and Graduate Diploma/Graduate Certificate
Level 7	Masters
Level 8	Doctoral

There is a broad range of definitions of the qualifications within each level allowing for different expected volumes of study for example a masters may be expected to take 1 or 2 years and may be by coursework, mixed mode, research or a Specialist Masters in Medicine. A Bachelors degree might be characterised as “academic” or “non-professional” which might take 3 years or 4 years if there is an additional prescribed period of workplace learning as prescribed in some disciplines. In addition to this there are Bachelors for Professional Recognition and Practice that are required to enter into a regulated occupation or profession and are normally 4 or 5 years. The doctoral level makes specific allowance for three types of doctorates.: PhD for research doctorates and for applied or professional doctorates with discipline specific titles.

Domain descriptors

Compared with AQF there is a significant emphasis on learning outcomes that represent ethics and morality, spirituality, national identity, language proficiency, cultural and civilizational literacy and on entrepreneurial mindset and skills.

The clustered domains of learning outcomes are:

- i. Knowledge and understanding
- ii. Practical/work skills
- iii. Interpersonal/communication, ICT and numeracy skills/entrepreneurial skills
- iv. Leadership, autonomy and responsibility
- v. Personal skills and ethical skills

Each qualification level is provided with a generic statement which describes the learning achievement at a particular level. The purpose of the level descriptors is to :

- Guide course design
- Allow shared understanding and comparison of qualifications in various field
- 179 of 209 • Provide one set of generic level descriptors that are applicable to the variety of learning contexts such as academic, professional, technical and work including industrial attachments, field work etc.
- Intended to fit academic and vocational qualifications at a given level regardless of subject area. They are contextualised within the technical, vocational or professional subject area.
- Act as a reference point in assessment of prior experiential learning for advanced standing
- Act as broad based guidelines and be non-prescriptive of learning standards
- Provide for each level the expected capabilities /competencies of learners on completion of study.

Volume of learning / duration

Credit system is based on academic load which includes all the activities the student undertakes to achieve defined learning outcomes.

Notional credit value is one credit equivalent to 40 Notional Learning Hours (NLHs).

Credit load per semester is normally no greater than 20 credits and a table defines the minimum credit load:

Cert 1 15; Cert 2 30; Cert 3 60; Diploma 90; Advanced Diploma 40; Bachelor 120; Professional Bachelor and/or Honours 130; Masters 40 Doctoral degree (coursework and mixed mode) 80.

Foundation and enabling / non-formal informal validation/ credit transfer

The MQA Act requires a system of credit accounts and credit transfer allows learners to progress vertically and horizontally and have prior learning recognised whether formal or informal.

The MQA has developed guidelines, instruments and criteria to assess prior learning and to establish assessment centres. Portfolios and/or examinations may be used.

The MQA (p.18) states that “it is also likely, in response to consumers demand , alternate credentialing such as micro-credentials, badges etc. will become a part and parcel of the qualifications Malaysian institutions may confer, in the context of lifelong learning. These forms of learning achievements should be quality assured”.

There is a specific policy for accreditation of prior experiential learning (APEL) for admission and for credits.

The Graduate Certificate and Graduate Diploma (both Level 6) are considered to support lifelong learning pathways by enabling learners to progress and to acquire advanced knowledge from a Bachelor or equivalent to the Masters level. These can be conferred after successful completion of formal continuing education to recognise specialist expertise in a field and can also be used as credit towards a Masters.

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Ancillary policies

MQA recognises the importance of educating all stakeholders about the MQF and how it ensures clarity for employers, parents, foreign recruiters etc. and assists mobility of students and workers.

The MQF specifies the use of qualifications titles and nomenclature.

Mandatory minimum credit accumulation for each level is set by the MQF as a Credit-reference Qualifications Framework. Various policies to support credit transfer between programs and institutions are in place.

Policies are in place to allow multiple entry and exit points to the 'ladderised' Levels 1-4.

Policies are in place for provision of flexible and on-line learning

XIII. Mexico

OVERALL SUMMATION

The MMC level descriptors are worth inspection because of their inspirational but simple and relatively jargon-free expression.

The Mexican credit bank could be worth exploring but a source for it in English could not be found.

GOVERNANCE

Legislative framework, administering agencies and oversight of QA and compliance

The Mexican qualifications framework (MMC) is developed and administered by the General Directorate of Accreditation, Authorisation and Recognition (DGAIR) within the Secretariat of Public Education (SEP). The DGAIR is also responsible for regulating and assessing the national system of accreditation and certification, promoting national and international mobility of students, regulating the operation of private providers and allocating scholarships.

Policy objectives

The main objectives of the MMC are to:

- Serve as a reference for the certification process
- Recognise partial qualifications through accumulation and transfer of credits
- Recognise existing qualifications in cooperation with other bodies and institutions
- Recognise learning outcomes from formal, non-formal and informal learning
- Support readability and coherence of each qualification
- Improve quality, accessibility and comparability of qualifications and labour certification by explicitly classifying qualifications according to complexity of level descriptors
- 182 of 209 • Cover all sectors, formal and non-formal throughout the continuum of education as well as broader social competences, aptitudes and values
- Improve comparability between education sub-systems formal, non-formal and between vocational training and labour competences

Extent of stakeholder involvement

Involves all sector leaders, employer and workers in an active role in designing the national system of competence standards and the framework and developing new paradigms of competence assessment in addition to traditional testing.

Subcommittees in various industries include employers, workers, high level executives, experts in various field, social organisations and government institutions.

STRUCTURE OF THE NQF

Number of Levels and qualifications covered

The MMC has 8 levels and is similar in design to the EQF.

Level 0	Preschool
Level 1	Primary
Level 2	Secondary
Level 3A	Basic technician, assistant technician
Level 3B	General secondary or vocational secondary technician
Level 4	Superior technician
Level 5A	Associate professional and superior technician
Level 5B	Professional licence, technical licence
Level 6	Bachelor degree
Level 7	Master degree or Diploma of Higher Specialisation
Level 8	Doctorate

Domain descriptors

There are five labour competence level descriptors aligned with the first five levels of the MMC. They are:

- Knowledge and abilities to execute a particular function
- Social skills including the ability to work in teams and build social networks based on relationship of trust with others
- Attitudes including self-reliance and resilience, motivation to achieve projected goals and the strength to fight for one's beliefs
- Intellectual competences, including the ability to generate new ideas
- Ethical competences, including core values and a sense of right and wrong

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Volume of learning / duration

Not available in English

Foundation and enabling / non-formal informal validation/ credit transfer

Agreement 286 is a designed to give learners access to all levels of the education system by offering an alternative pathway to the formal system. It allows competence certificates to be equivalent to credits of formal education programs at vocational and professional levels.

The Mexican Bank of Academic Credits allows certificates of accredited certification centres to count towards formal educational programs at upper middle and higher levels.

There are specific programs for certification of competences for disabled people, indigenous non-Spanish speakers, social workers serving these sectors and child and women's protection.

Companies are legally obliged to provide employees with training based on competence standards and assessment is based on portfolios, observation of work performance, interviews and possibly assessments.

Recognition of non-formal and informal learning is conducted differently in schools, VET, the employment sector and higher education.

XIV. Netherlands

OVERALL SUMMATION

The NLQF aims to better describe the Dutch education system and institute better quality controls over non-regulated private providers.

It offers no relevant innovations or ideas for the AQF.

GOVERNANCE

Legislative framework

The NLQF covers qualifications regulated by the public sector ie various government ministries and also covers qualifications offered outside public regulation and developed by the private sector mostly in the labour market.

The NLQF explicitly has no role in reforming education and training, regulating transfer or access or in entitlements to degrees or qualifications. It is merely a systematic description of existing qualifications.

Administering agency and oversight of QA and compliance

The Ministry of education, Culture and science coordinates the development and implementation of the NLQF through a secretariat.

Obligatory higher education accreditation continues through the established NQF for higher education and is managed by the accreditation organisation for the Netherlands and Flemish community of Belgium.

Policy objectives

Main policy objectives are to:

- Increase transparency within the education system
- Increase understanding of qualifications within Europe
- Increase qualification level comparability
- Ensure learning outcomes are seen as building blocks of qualifications
- Promote lifelong learning
- Increase transparency of learning routes
- Increase understanding of qualifications levels across the labour market
- Aid communication between stakeholders in education and employment.

Extent of stakeholder involvement

Limited.

STRUCTURE OF THE NQF

Number of Levels, taxonomy design and domain descriptors

- Levels do not refer to and are not defined by education sectors.
- Levels are not referenced to degrees or titles.
- All NLQF levels are open to all qualifications of all sectors.

There are 9 levels (1 entry level and 8 qualifications levels) and for each level descriptors are used in the following domains:

- Context to determine the grade of difficulty
- Knowledge – the totality of facts, principles, theory and ways of working
- Skills in 5 subsets:
 - Applying knowledge
 - Problem -solving skills
 - Learning & development skills
 - Information skills
 - Communication skills

Qualifications covered

All public sector and an increasing number of private sector training qualifications.

Volume of learning / duration

N/A

Foundation and enabling / non-formal informal validation/ credit transfer

Validation of non-formal and informal learning is supported by a national policy. In the labour market VPL is aimed at career guidance for adults and involves portfolios, and competence tests. VPL via the education route involves the usual assessment of RPL and entry standards.

Ancillary policies

N/A

XV. New Zealand

OVERALL SUMMATION

The NZQF appears to offer more structural support for inclusion of non-formal and informal learning as entry points to formal qualifications by being explicit about flexibility as one of its guiding principles.

It also seems to cover a similar range of content to the AQF but it does so in 36 pages rather than the 112 pages taken by the AQF. This disparity could be more closely examined to ensure that the AQF is not unnecessarily verbose or complex.

GOVERNANCE

Legislative framework

The NZQF is established under the Education Act.

Administering agency

The NZ Qualifications Authority (NZQA) administers the NZQF.

Policy objectives

To:

- Convey the skills, knowledge and attributes of a graduate and provide high-quality education pathways
- Ensure qualifications meet the needs of learners, employers, industry and the community
- Assure the quality and international comparability of NZ qualifications
- Contribute to Maori success in education by recognising and advancing Maori worldview and experience

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Oversight of QA and compliance

The framework has clear and simple statements about the necessary design features for a qualification (p.7)⁷².

NZ Qualifications Agency (NZQA) maintains and quality assures New Zealand's qualifications system for the non-university tertiary education sector and Universities New Zealand fulfils this function for the university sector.

⁷² <http://www.nzqa.govt.nz/assets/Studying-in-NZ/New-Zealand-Qualification-Framework/requirements-nzqf.pdf>

Extent of stakeholder involvement

Not stated

STRUCTURE OF THE NQF

Number of Levels and qualifications covered

The NZQF has 10 levels from senior secondary school to tertiary education.

Levels 1-4	Certificates
Level 5-6	Certificate / Diploma
Level 7	Bachelor and Graduate Diploma and Certificates
Level 8	Bachelor honours and Postgrad diplomas and certificates
Level 9	Master degree
Level 10	Doctoral degree

Taxonomy design

Qualifications on the NZQF are based on need (relevance and value) and outcomes. Levels 1 to 6 also require flexibility in method and place of delivery of learning, including non-formal learning experiences and collaboration with stakeholders in the development of the qualifications.

Each outcome statement includes a graduate profile, the education pathway and the employment pathway.

Domain descriptors

There are three principle descriptors:

Knowledge: from basic through factual, operational, theoretical, technical, specialised, frontier

^{188 of 209} Skills: Skills progression is described through integration, independence and creativity, and the type, range and complexity of problems and solutions

Application of knowledge and skills: expressed in terms of self-management, leadership, responsibility, autonomy, accountability

Volume of learning / duration

Each qualification has a credit value based on how long the designer considers it would take the learner to achieve the outcomes.

One credit is equivalent to 10 notional learning hours (including contact time, assessment and self-study). A typical learner is considered able to complete 120 credits of learning in a year.

Each qualification in the framework specifies the number of credits required at specified levels in order to earn that qualification.

Foundation and enabling / non-formal informal validation/ credit transfer

Qualifications recognise learning gained in many different ways. The learning can happen at any stage of a person's life, in either part-time or full-time study, and in a range of places and ways:

- on-job
- in education institutions
- electronically
- online
- by distance
- a mixture of ways.

The NZQF does not put limitations on how or where people can learn.

NZQA prescribes the details for credits, cross credits, recognition of prior learning and moderation through its Approval and accreditation rules and all providers are required to have arrangements in place for RPL and credit recognition and transfer. NZQA has established operational principles for credit transfer.

Ancillary policies

A number of ancillary guidelines exist covering approval for inclusion at levels 1-6, qualifications listing and operational rules, and guidelines for program approval and accreditation to provide programs.

These documents are available on the NZQA website at <http://www.nzqa.govt.nz>

XVI. Norway

OVERALL SUMMATION

The NKR offers no particular insights for the AQF.

GOVERNANCE

Legislative framework

The Norwegian National Qualifications Framework for lifelong learning was adopted by the Ministry of Education and Research in 2011 and updated in 2014.

The NKR only covers qualifications established through national legislation and awarded by publicly recognised and accredited education and training institutions. Multi stakeholder working parties have been unable to agree on broadening inclusion to the non-formal sector. Agreement has also not been reached on the role of the framework in a broader national competence strategy linking education and training and the labour market.

Administering agency and oversight of QA and compliance

The Norwegian Agency for Quality Assurance in Education (NOKUT) is the national coordination point for EQF and is the national secretariat for NKR.

Policy objectives

Focusing on improving transparency of qualifications the NKR is not a tool for reform.

It aims to:

- Focus on learning rather than teaching
- Focus on outcomes rather than inputs
- Facilitate individuals planning learning progression
- Describe differences in learning outcomes between levels
- Support lifelong learning
- Make qualifications more understandable to the labour market and society in general
- Clarify to learners what knowledge, skills and competences they have acquired
- Aid international recognition of qualifications
- Ensure competences are better utilised by individuals and society in general

Extent of stakeholder involvement

Training, education and labour market stakeholders have been extensively involved.

STRUCTURE OF THE NQF

Number of Levels and qualifications covered

The NKR consists of 7 levels covering general, vocational and higher education⁷³.

Level 1	Not part of the NQF – no qualifications included
Level 2	Certificate of primary and lower secondary education
Level 3	Certificate of partially completed upper secondary education and training
Level 4A	Certificate of completed general upper secondary education
Level 4B	Certificate of completed vocational upper secondary education eg journeyman's certificate
Level 5.1	Certificate of completed post-secondary VET1
Level 5.2	Certificate of completed post-secondary VET2
Level 6	Partial Bachelor (University College Graduate) and Bachelor
Level 7	Master degree
Level 8	PhD degree

Domain descriptors

Level descriptors are:

- Knowledge – understanding of theories, facts, principles, procedures in subject areas and/or occupations
- Skills – ability to utilise knowledge to solve problems or tasks (cognitive, practical, creative and communication skills)
- General competence – ability to utilise knowledge and skills in independent manner in different situations

Volume of learning / duration

Not covered in the framework.
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Foundation and enabling / non-formal informal validation/ credit transfer

There are laws and regulations on validation of non-formal and informal learning for each of the NKR levels. Each institution offering qualifications above level 5 is autonomous and there are no mandated procedures for validation of competence.

⁷³ <https://www.nokut.no/en/norwegian-education/nqf/beskrivelser-av-laringsutbytte-for-nivaene-i-nkr/>

Ancillary policies

Not available

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XVII. Saudi Arabia

OVERALL SUMMATION

Important shift from a NQF that dealt only with academic qualifications to one that encompasses general, vocational and non-formal education and training⁷⁴.

GOVERNANCE

Legislative framework

The SAQF was developed to contribute to the reform of education in Kingdom of Saudi Arabia (KSA) and is anticipated to be approved by the Council of Ministers. It is a national framework for integrating education, training and employment in a unified structure. It is expected to be implemented in 2018.

The former NQF for KSA dealt only with higher education.

Administering agencies and oversight of QA and compliance

The Education Evaluation Commission has been established to develop, set up and supervise the NQF with stakeholder collaboration.

Policy objectives

SAQF goals are to:

- Establish national standards for Awarding Bodies to safeguard the quality of qualifications designs.
- Establish national standards for qualifications.
- Facilitate flexible pathways, access, and progression opportunities between education, training and employment sectors.
- Engagement with stakeholders to identify the need for developing new qualifications in the country.
- Contribute to the Socio-Economic growth by identifying employability skills needed for the Saudi labour market.

Extent of stakeholder involvement

The SAQF was developed through engagement with 70 organisations across the public and private sector including employers.

STRUCTURE OF THE NQF

⁷⁴ <http://edc.rcyci.edu.sa/edc/news/1608/>

Number of Levels and qualifications

The SAQF promotes mechanisms for the recognition of all types of learning and supports progression between the technical, vocational, academic and training sectors.

There are 10 levels in the new SAQF.

Levels 1 to 3 cover elementary, intermediate and general education certificates and Certificates 1, 2 and 3 for TVET

Level 4	TVET Certificate 4
Level 5	TVET Assoc Diploma and HE Assoc Diploma
Level 6	TVET Diploma and HE Diploma/Assoc degree
Level 7	TVET Technical Bachelor degree and HE Bachelor degree
Level 8	HE Higher Diploma
Level 9	TVET Master degree and HE Master degree
Level 10	PhD (HE only)

Taxonomy design

The 10 SAQF levels provide an indication of the complexity of the qualifications and their components.

Domain descriptors

Each level of the SAQF has a generic level descriptor which reflects the increase in learning demand through the domains of knowledge, skill and competence.

Volume of learning / duration

Not described
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Foundation and enabling / non-formal informal validation/ credit transfer

Over time the SAQF will extend recognition to different types of formal, non-formal and informal learning which will underpin the notion of lifelong learning and support RPL from different contexts.

Ancillary policies

Not yet available

XVIII. Scotland

OVERALL SUMMATION

The Scottish system is unique and worth consideration in review of the AQF. It is not regulatory but provides a national coordination and support system to assist non-regulated providers to establish the worth of their training provision as entry to or credit towards formal learning.

It uses a broader range of level descriptors than EQF allowing it to be more explicit⁷⁵.

GOVERNANCE

Legislative framework

The SCQF is not a regulatory body. It is a company limited by guarantee whose members are:

- The Quality Assurance Agency for Higher Education
- College Development Network
- The Scottish Qualifications Authority
- Universities Scotland

Budget is provided by the Scottish Government and the Scottish Funding Council and amounted to GBP 700,000 in 2015. Additional funding comes from consultancy work and EQF subsidies.

Administering agency and oversight of QA and compliance

The Scottish credit and qualifications framework partnership (SCQFP) was set up as a charitable company in 2006, formally independent of national education and training authorities. This independence allows for active engagement with a broad group of stakeholders including qualifications authorities, quality assurance bodies, universities, colleges and employers. The SCQFP Board established a SCQF Quality Committee composed of experts in quality assurance from a number of educational and business environment.

Policy objectives

The Scottish Qualifications Framework (SCQF) aims to provide a better public understanding of the full range of qualifications and the role they play in lifelong learning and workforce development.

The SCQFP aims to:

- Maintain the quality and integrity of the framework
- Promote and develop the framework as a tool to support lifelong learning

⁷⁵ <http://scqf.org.uk/the-framework/>

- Develop and maintain relationships with frameworks in the uK, Europe and internationally.

Extent of stakeholder involvement

The SCQF Forum helps to promote and extend the use of the SCQF and comprises senior representatives from education, business and the community. It encourages the private sector and employers to have their training provisions accredited and included under the framework.

STRUCTURE OF THE NQF

Number of Levels

The SCQF has 12 levels .

Levels 7 to 12 are offered through universities from Certificate of Higher Education at Level 7 to the doctoral degree at level 12.

Levels 4 through 12 are offered through Apprenticeships and Scottish Vocational Qualifications (SVQs) from Level 4 SVQ to Level 12 Professional Apprenticeship.

Scottish Qualifications Authority Qualifications extend from level 1 through 12 from National 1 awards in school to professional development awards at every level.

Qualifications covered

All higher education and vocational qualifications as well as school and foundational studies.

Domain descriptors

The SCQF provides a detailed description of level descriptors and how to develop and use them⁷⁶. There are 5 level descriptors:

- Knowledge and understanding
- Practice, applied knowledge, skills and understanding
- 197 of 209 • Generic cognitive skills
- Communication, ICT and numeracy skills
- Autonomy, accountability and working with others

Volume of learning / duration

The interactive framework is currently being updated and these are not available. However, individual units of learning are assessed for their credit point value and noted accordingly. One credit = a notional 10 hours of learning time which includes everything a learner has to do.

⁷⁶ <http://scqf.org.uk/wp-content/uploads/2014/03/SCQF-Level-Descriptors-WEB-Aug-2015.pdf>

Foundation and enabling / non-formal informal validation/ credit transfer

The first 4 levels of the framework could be considered foundational and enabling.

There is no national policy or strategy on RPL and providers offering RPL have a wide variety of approaches

Centralised guidance on RPL comes from the SCQFP, the QAA for Higher Education in Scotland and the Scottish Qualifications Authority. Most RPL is in higher education and guided by the national RPL Framework for Higher Education⁷⁷

The SCQF explicitly aims to have private organisations and employers seek accreditation for their training programs and inclusion on the SCQF database. This inclusion:

- Gives in-house training recognition and a comparison with nationally recognised qualifications.
- Helps employees map their learning pathways and gain personal recognition and to progress into more advanced learning programs
- Encourages employees to undertake learning
- Promotes skills development and support skills utilization

The approach is unit based (supported by credit points) and allows for inclusion and levelling of qualifications of differing character and size. There are more than 11,000 qualifications on the database.

Ancillary policies

The SCQF provides :

A qualification database <http://scqf.org.uk/the-framework/search-database/>

The SCQF credit system <http://scqf.org.uk/the-framework/scqf-credit-points/>

Arrangements for recognition of prior learning <http://scqf.org.uk/more/rpl/>

Guidance and support material for employers <http://scqf.org.uk/employers/>

Information on Credit Rating Bodies (CRBs) who are education provider organisations that are authorised to carry out credit rating i.e. determine the SCF level and credit points for recognition in the SCQF. <http://scqf.org.uk/credit-rating-bodies/>

⁷⁷ <http://www.qaa.ac.uk/en/AboutUs/Documents/Recognition-of-prior-learning.pdf>

XIX. South Africa

OVERALL SUMMATION

South Africa exhibits special circumstances due to its history of apartheid.

The framework is multi-dimensional in that it while the levels cross all sectors it has three sub-frameworks with responsibility for qualifications shared across agencies responsible for higher education, trades and occupations and general and further education.

GOVERNANCE

Legislative framework

The National Qualifications Framework Act 67 of 2008 provides for the National Qualifications Framework (NQF). The NQF is a comprehensive system, approved by the Minister of Higher Education and Training, for the classification, registration and publication of articulated and quality-assured national qualifications and part-qualifications.

The South African NQF is a single integrated system comprising three co-ordinated qualifications Sub-Frameworks for General and further Education and Training, Higher Education and Trades and Occupations.

Administering agencies and oversight of QA and compliance

South African Qualifications Authority (SAQA)

The South African Qualifications Authority (SAQA) was established by Parliament to:

- Advance the objectives of the NQF;
- Oversee the further development and implementation of the NQF;
- Co-ordinate the Sub-Frameworks.

Policy objectives

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The objectives of the NQF are to:

- Create a single integrated national framework for learning achievements;
- Facilitate access to, and mobility and progression within, education, training and career paths;
- Enhance the quality of education and training;
- Accelerate the redress of past unfair discrimination in education, training and employment opportunities.

The objectives of the NQF are designed to contribute to the full personal development of each learner and the social and economic development of the nation at large.

Extent of stakeholder involvement

DHET is responsible for universities, universities of technology, further education and training colleges (which are being renamed as community colleges and TVET colleges), adult basic education and the entire training sector. Individual training colleges (for nursing, agricultural and similar specialist occupations) are still functioning under different departments. DBE is responsible for the formal schooling sector from primary to secondary school, as well as for the national adult literacy campaign, known as Kha Ri Gude.

The NQF continues to be led by a central statutory body, SAQA, with extensive input by other stakeholders. Three sector-specific bodies known as quality councils have taken over responsibility for quality assurance and standards development within their respective sectors, while SAQA registers qualifications on the NQF once they meet the stipulated criteria.

The quality councils are responsible for the sub-frameworks of higher education, further and general education and training, and trades and occupations. Each quality council is responsible for determining qualification types in accordance with SAQA criteria. SAQA is responsible for maintaining the NQF and coordinating the sub-frameworks.

The three quality councils and SAQA report to the Minister of Higher Education and Training, while Umalusi (one of the quality councils) on certain aspects also reports to the Minister of Basic Education.

Representatives from trade unions, provider bodies (including higher education, further education and general education), professional bodies, employers and experts serve on the boards and councils of SAQA and the quality councils. Professional bodies have been given the opportunity to take on specific responsibilities related to qualifications development and quality assurance, provided they meet SAQA policy and criteria. By 31 March 2017, 93 professional bodies had already met these requirements and over 343 professional designations had been registered.

STRUCTURE OF THE NQF

Number of Levels and taxonomy design

The NQF is organised as a series of levels of learning achievement, arranged in ascending order from one to ten. Each level on the NQF is described by a statement of learning achievement known as Level Descriptors. There is one set of level descriptors for the NQF.

The NQF is a single integrated system which comprises of three co-ordinated qualifications Sub-Frameworks. These are:

General and Further Education and Training Sub-Framework (GFETQSF)

The Higher Education Qualifications Sub-Framework (HEQSF)

The Occupational Qualifications Sub-Framework (OQSF)

The Sub-Frameworks have qualifications registered at the following NQF levels:

GFETQSF - levels 1 to 4;

HEQSF - levels 5 to 10;

OQSF - levels 1 to 6. For NQF levels 7 and 8 the Quality Council for Trades and Occupations can motivate for a qualification only in collaboration with a recognised professional body and the Council on Higher Education, in a process co-ordinated by SAQA.

Qualifications covered

Designed according to who quality assures the various levels.

Domain descriptors

There are 10 categories of the level descriptors

- Scope of knowledge
- Knowledge literacy
- Method and procedure
- Problem solving
- Ethics and professional practice
- Accessing, processing and managing information
- Producing and communicating of information
- Context and systems
- Management of learning
- Accountability.

Volume of learning / duration

Not included in the framework

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Foundation and enabling / non-formal informal validation/ credit transfer

Two types of RPL have emerged:

for credit, usually associated with the occupational and trades sector, and

for access, usually associated with higher education.

In the 18 years since the creation of the RPL policies over 59 000 people have achieved full qualifications via an RPL route. Most RPL achievements, however, have been in part-qualifications where 1.1 million learner achievements have been recorded. From 'islands of excellent practice', the country continues to move towards a national RPL system,

Ancillary policies

Available on the website

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XX. Sweden

OVERALL SUMMATION

The Swedish SeQF has increased its emphasis on vocationally oriented courses. Unfortunately much of the detail is not available in English.

However, the separate qualifications framework for higher education continues to be self-certified to the qualifications framework in the European higher education area (EHEA).

GOVERNANCE

Legislative framework

The Swedish national qualifications framework (SeQF) came into law as SeQF Law and Regulation 2015:545: on a qualifications framework for lifelong learning. Following legal adoption criteria and procedures for inclusion of non-formal qualifications have been put in place.

The framework is seen as not only describing existing qualifications but also as supporting better cooperation between education and training and the labour market

Administering agencies and oversight of QA and compliance

The Ministry of education and research has overall responsibility for work on the NQF and the National Agency for Higher Vocational Education (MYH) is the authorised gatekeeper (supported by an advisory council from all stakeholders and the labour market). MYH put into place the necessary procedures and criteria to allow the non-formal and formal sectors to be linked in 2016.⁷⁸ The MYH was set up in 2009 with responsibility to administer a new and vocationally oriented strand of higher education and training. Higher vocational education offers an alternative to the traditional university sector by combining theoretically and practically oriented learning through new institutions. It analyses labour market demands for qualifications, carries out inspections, conducts reviews and promotes quality improvement.

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The MYH emphasis on the introduction of non-academic level 5 and 6 qualifications does, however, put at risk the commitment of higher education institutions to the SEQF. As a result, Sweden has decided to develop a separate qualifications framework for higher education. The character of levels 6 to 8 was discussed but the long-term interaction between the SeQF and the national framework for higher education is not addressed explicitly.

Policy objectives

The SeQF is a tool for opening up to qualifications awarded outside the public system, particularly in the adult/popular education sector and the labour market. Adult and popular

⁷⁸ <https://www.myh.se/in-English/EQF/>

education is very strong in Sweden but its links to the ordinary public system are not clear. Similarly, a lot of VET training is offered by enterprises and sectors including schools. Upper secondary offers a full range of 3 year vocational courses that sometimes require further certification to practice a vocation. The framework will increase transparency and clarify options for progress and transfer.

Several “non-academic” stakeholders such as the sports sector and the construction industry are interested in using it as a reference for better structured training and progression routes. The institutes that train teachers for VET have used it to identify pathways into training through work experience and formal secondary schooling and to indicate minimum requirements in RPL and qualifications.

A new type of formal post-secondary education was created in 2015 for Arts and Culture courses which vary in duration from a few days to several years, are all provided by private providers who are subject to state regulation. Many courses prepare students for undergraduate studies in academies for fine arts, music or performing arts, others prepare for direct entry into professions such as dancer or designer.

Extent of stakeholder involvement

A broad range of stakeholders from education and training as well as the labour market has been involved in its development reflecting the government desire to open up the framework to qualifications offered outside the public sector.

STRUCTURE OF THE NQF

Number of Levels and taxonomy design and qualifications covered

SeQF has 8 levels that align with the EQF levels:

Level 1	Special needs education
Level 2	Compulsory education for young and corresponding education for adults, special needs schools and Swedish tuition of immigrants
Level 3	Unstated
Level 4	Upper secondary level
Level 5	Qualified graduate from upper secondary engineering courses Diploma in higher education
Level 6	Bachelor Diploma Advanced Diploma in higher vocational education
Level 7	Master Diploma
Level 8	Doctorate Diploma

Higher vocational education qualifications are offered at levels 5 and 6 by educational institutions such as universities, local authorities or private training companies. They are tailored to suit a changing market so the range of specialisations and programs changes over time. Completion of a one year minimum program earns the award of Higher Vocational Education Diploma. Completion of a 2 year minimum program results in Advanced Higher Vocational Education Diploma.

Duration is between 1 and 3 years, all are at post-secondary level and qualify for student financial aid from the government. Most do not charge fees.

Industry partners play a leading role in developing and teaching programs and most include work placement.

Domain descriptors and volume of learning / duration

Domain descriptors are knowledge, skills and competence

The detailed descriptors of each level are only provided in Swedish

Volume of learning is equivalent with EQF and EHEA standards

Foundation and enabling / non-formal informal validation/ credit transfer

A set of procedures and criteria has been developed for inclusion/levelling of non-formal qualifications to the SeQF. Levels 1 to 3 cover foundation and enabling courses.

The 2015 Budget Bill allocated SEK 141million to strengthen validation measures, mostly related to migrants' qualifications and experiences.

A new national committee (the National Delegation for Validation) was set up to promote a strategy on validation, and there is a formal consultation on validation preparing a bill to be presented to parliament. Weaknesses are seen to be due to the decentralised, complex and pluralistic nature of existing arrangements.

Ancillary policies

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Not available in English

XXI. Wales

OVERALL SUMMATION

The emphasis on lifelong learning is strong at least in theory, in that quality assured lifelong learning is an integral part of the Framework. However, no details on how that operates were able to be found.

A notable aspect of the CQFW is the parallel classification of VET and further education with higher education through all levels up to and including level 7.

GOVERNANCE

Legislative framework

The credit and qualifications framework for Wales (CQFW) includes all formal and regulated qualifications including quality assured lifelong learning (QALL). It has no regulatory functions but brings together the main stakeholders engaged in regulation of qualifications.

All regulated qualifications refer to the new Ofqual level descriptors for the regulated qualifications framework (RQF) in England and Northern Ireland. Non-regulated qualifications refer to the CQFW descriptors.

Administering agencies and oversight of QA and compliance

The CQFW⁷⁹ is managed by a strategic operational partnership comprising the Welsh Government (oversight of QALL), Higher Education Funding Council for Wales (oversight of higher education) and Qualifications Wales which is a new government body responsible for regulated qualifications outside higher education.

There is a multi-sectoral CQFW Advisory Group for annual review of the CQFW and its objectives.

Policy objectives

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CQFW is an enabling tool for economic and skills policies and goals. It aims to :

- Provide a national qualifications framework for learners of all ages and abilities
- Provide a common currency for learning achievement
- Support the recognition of credit and qualifications across all levels enabling learners to progress
- Support providers in articulating pathways of progression that are easily understood, transferable and consistent

⁷⁹<http://gov.wales/topics/educationandskills/qualificationsinwales/creditqualificationsframework/?lang=en>

Extent of stakeholder involvement

CQFW Advisory group includes government, the HE funding council and Qualifications Wales, Careers Wales, Federation of Awarding Bodies, NUS Wales, and a range of social and community partners.

STRUCTURE OF THE NQF

Number of Levels and qualifications covered

There are 8 levels in the CQFW and an Entry level which is outside the framework

Level 1	NVQ1, GCSE D – G, Welsh Baccalaureate Qualification (WBQ)
Level 2	NVQ2, GCSE A-C, WBQ
Level 3	NVQ3, 'A' Level, Modern Apprenticeship, WBQ, Access to Higher Education
Level 4	Certificate of Higher Education, Vocational Quals, Apprenticeships, HNC
Level 5	Vocational Quals, Apprenticeships, HND, Foundation Degree
Level 6	Vocational Quals, Professional Certificates in Education, Apprenticeships, Honours Degree
Level 7	Vocational Quals, Postgrad Certificates in Education, Apprenticeships Masters
Level 8	Doctoral, Industry quals e.g. chartered accountants

Taxonomy design

Quality Assured Lifelong Learning and work-based learning/training providers span all levels

School spans levels from Entry to level 3.

Further education institutions span Entry to level 6

Higher education institutions span level 4 to level 8

Domain descriptors

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As for UK and Northern Ireland

Volume of learning / duration

According to the Qualifications and Credit Framework (QCF) for vocational qualifications for England, Wales and Northern Ireland each unit and qualification in the QCF has a credit value (1 credit is 10 hours). There are three sizes of qualifications in the QCF:

Awards – 1 to 12 credits

Certificates – 13 to 36 credits

Diplomas – 37 credits or more

Foundation and enabling / non-formal informal validation/ credit transfer

The system for quality assured lifelong learning (QALL) is an integrated pillar of CQFW and is based on the belief that all learning, wherever and whenever it takes place should be valued and recognised. It is a system of validation of non-formal learning provision which is recognised as a unit on the CQFW. QALL particularly benefits disadvantaged learner groups helping to raise aspirations and promote progression opportunities.

RPL is developed with different approaches for VET, higher education and adult learning, each developed by the providers themselves. There are no systems to coordinate validation across different sectors and awareness and use of it by both employers and learners is limited. There is said to be a “lack of strategic national drive” for RPL. This is seen as a disadvantage for workforce adaptability to change

Ancillary policies

Not available within the framework.

XXII. Regional Frameworks

Regional frameworks are primarily reference points for countries within and outside their region to benchmark their own national qualifications against. They are in various stages of development and there has been considerable cross-referencing among them.

Individual countries often have significant differences in their school systems and their social and economic objectives as well as their cultural traditions. Regional frameworks accommodate these differences by providing touch points to reference national frameworks against and by providing generic principles. Most rest on agreed fundamental objectives:

- To encourage outcomes-based education and training
- To enable comparison and recognition of qualifications across member states
- To support lifelong learning and encourage the development of national approaches to validating learning gained outside formal education
- To promote learner and worker mobility
- To promote public awareness and understanding of qualifications systems
- To promote quality assurance principles and standards and higher quality education and training

Region (No of member states)	Levels	Domains for descriptors of each level
Pacific QF (15)	10	Knowledge & skills Application Autonomy
ASEAN Qualifications Reference Framework AQRF (10)	8	Knowledge and skills Application and responsibility
European Qualifications Framework EQF (39)	8	Knowledge Skills Autonomy and responsibility
Gulf Qualifications Framework (6)	10	Knowledge Skill Autonomy and responsibility Role in Context Self-development
Caricom (Caribbean Community) QF	10	Knowledge & understanding

Region (No of member states)	Levels	Domains for descriptors of each level
(15)		Application & practice Communication, numeracy & ICT Life skills Autonomy, accountability & working with others
Southern African Development Community RQF (15)	10	Knowledge Skills Autonomy and responsibility