Review of the Australian Qualifications Framework

Discussion Paper   DECEMBER 2018

Contents

Chair's Foreword

The Expert Panel for the Review of the Australian Qualifications Framework is pleased to release this discussion paper to help guide input to the Review through written submissions and consultations.

The Panel's final report and an implementation plan will be considered by the Australian Government Minister for Education as well as the Council of Australian Governments' (COAG) Education Council and its Industry and Skills Council. This process reflects the role and importance of the AQF across three key sectors of Australian education, to industry and to other users of the Framework, and reflects the shared commitment by Australian governments to the objectives of the AQF.

Throughout the Review process, the Panel wishes to draw on the considerable expertise and experience that has developed across a broad range of organisations and individuals in relation to the Review's Terms of Reference. In this discussion paper, the Panel has opted to provide to organisations and individuals some of the Panel's initial thinking about the case for change to the AQF and possible approaches consistent with the Terms of Reference.

The Panel has opted for this approach in the interests of transparency and to test its thinking and possible approaches, but invites both differing analysis, conclusions and proposals to those advanced in the Paper. Through this process, the Panel's intention is to assess areas where reform is required, to explore possible approaches and to ensure that, as far as possible, there is understanding of and support for any reforms and consequent implementation processes. The Panel also recognises its role in providing independent and evidence-based advice to the Australian Government Minister for Education, the Australian Government Minister for Skills and Vocational Education and the relevant COAG Councils in its final report.

Peter Noonan

Chair

Australian Qualifications Framework Review Panel

1. The AQF Review

The Australian Government announced the Australian Qualifications Framework (AQF) Review in the 2017-18 Budget. The AQF is the national policy for regulated qualifications in Australia. As such, it affects education providers, industry and students. The AQF is agreed by the Council of Australian Governments (COAG). Both the COAG Education Council and the COAG Industry and Skills Council will need to consider and agree to any changes to the AQF recommended by this Review.

The AQF

The AQF puts senior secondary school, vocational education and training (VET) and higher education qualifications into a single, national framework. It has played an important role in the quality assurance of Australia's well-regarded tertiary education system and sets out the nature and purpose of senior secondary education. The AQF is used to assist recognition of Australian qualifications in other countries and has served as a model for the development of qualifications frameworks internationally.

The AQF has 10 levels that include descriptions of learning outcomes in terms of knowledge, skills and their application at increasing levels of complexity. It describes 14 qualification types. All qualification types except the senior secondary certificate of education are assigned to a level in the 10-level structure.

The AQF consists of:

- learning outcomes in terms of knowledge, skills, and the application of knowledge and skills for each AQF level
- learning outcomes (knowledge, skills, and the application of knowledge and skills) and a volume of learning for each AQF qualification type
- specifications for authorities that accredit, develop and issue each qualification type
- policies for: issuing AQF qualifications; AQF qualifications pathways; registers of accrediting and issuing organisations; the addition or removal of AQF qualification types; and principles for alignment with other countries' qualifications frameworks
- explanations that help interpret the way the AQF should be implemented.

The AQF levels and descriptors form a taxonomy of learning outcomes.

The objectives of the AQF are similar to those of many qualifications frameworks around the world. They are to provide a contemporary and flexible framework that:

- accommodates the diversity of purposes of Australian education and training now and into the future
- contributes to national economic performance by supporting contemporary, relevant and nationally consistent qualification outcomes which build confidence in qualifications
- supports the development and maintenance of pathways which provide access to qualifications and assist people to move easily and readily between different education and training sectors and between those sectors and the labour market
- supports individuals' lifelong learning goals by providing the basis for individuals to progress through education and training and gain recognition for their prior learning and experiences
- underpins national regulatory and quality assurance arrangements for education and training

- supports and enhances the national and international mobility of graduates and workers through increased recognition of the value and comparability of Australian qualifications
- enables the alignment of the AQF with international qualifications frameworks.

For more information about the AQF, read the full AQF document.

Why the AQF is being reviewed

When the AQF Council was disbanded in 2014, the Commonwealth Minister for Education agreed the AQF would be reviewed within five years.

From time to time, since it was introduced, the AQF has been revised to reflect or facilitate change in the education sector. Changes in the nature of work that affect the skills that graduates need and the types of qualifications that students and employers are seeking, now need to be considered for reflection in the AQF.

As it is seven years since it was last formally reviewed, it is timely to consider ways in which the AQF could be improved to keep it at the forefront of best practice in qualifications frameworks internationally.

AQF Review Panel

An expert panel has been appointed to conduct the AQF Review. Its members are:

- Professor Peter Noonan (Chair), Professor of Tertiary Education Policy, Victoria University
- Mr Allan Blagaich, Executive Director, School Curriculum and Standards, Department of Education, Western Australia
- Professor Sally Kift, Adjunct Professor, College of Business, Law & Governance, James Cook University
- Ms Megan Lilly, Head of Workforce Development, Ai Group
- Ms Leslie Loble, Deputy Secretary, External Affairs and Regulation, New South Wales Department of Education
- Professor Elizabeth More AM, Dean, Australian Institute of Management School of Business
- Ms Marie Persson, Member, New South Wales Skills Board, Chair, NSW Skills Board Industry Reference Group, Member, Monash Commission.

Approach to the Review

Since the AQF was last reviewed in 2009-11, national regulators for the VET and higher education sectors have been established and are underpinned by national quality standards in both sectors.[1] New and improved ways of teaching, learning and assessment have been developed and there are ongoing increases in educational attainment. There is growing interest in, and renewed support for, a more coherent tertiary sector. These developments have implications for the qualifications and policies set out in the AQF.

---

[1] Victoria and Western Australia have retained responsibility for VET providers in their jurisdictions.

Stakeholders have made the case for considering these changes in initial consultation with the Panel and in contextual research for the Review conducted by PhillipsKPA.[2] The issues highlighted are reflected in the Terms of Reference for the Review, which are at Appendix A.

In the discussion paper, the Panel has posed some possible approaches involving change to the AQF to show its preliminary thinking about how the AQF might evolve. In other areas, issues are raised for discussion but approaches are not advanced at this stage of the Review process.

The possible approaches, if implemented, may turn out to be short, medium or longer term in nature: short term - where immediate changes are required; medium term - where specific approaches are supported but details need to be fully worked through; and longer term - where more complex and far-reaching approaches might need to be explored. The Review final report and implementation plan will consider appropriate timing for rolling out any changes to the AQF and the type of governance that may be required. The implementation plan may include further work that is required to inform effective implementation.

The possible approaches are not formal or final proposals. The Panel welcomes alternative proposals in submissions, as well as comments on its preliminary thinking and areas of analysis covered in the paper. The Panel is interested in receiving proposals from education providers, industry, students and other stakeholders that consider the AQF as an overall framework. This will help it most to prepare a final report and an implementation plan.

The Panel has identified three broad questions for consideration through submissions and the consultation process:

- **In what ways is the AQF fit, or not fit, for purpose?**

- **Where it is not fit for purpose, what reforms should be made to the AQF and what are the most urgent priorities? Please be specific, having regard to the possible approaches suggested in this paper and other approaches.**

- **In relation to approaches suggested by the Panel or proposed in submissions or through consultations, what are the major implementation issues the Review should consider? Please consider regulatory and other impacts.**

In preliminary consultations, people have raised a wide range of issues for consideration. Most of these issues that relate to the design and structure of the AQF fall directly within the Review Terms of Reference. Other issues relate more to how the AQF is interpreted and applied in the development and delivery of qualifications; for example where qualifications are not perceived to be at an appropriate level and where qualifications are not being appropriately delivered or are being made available for learner cohorts for whom they were not designed. The Panel will carefully consider these issues and will make judgements about whether specific issues should be addressed in the Review or are more appropriately the responsibility of the authorising and regulatory bodies in each sector.

Issues that clearly fall outside of the Terms of Reference - even though they may affect the application of the AQF - include funding; overall system governance; the use of specific qualifications in industrial awards or by external professional or occupational regulators; and the content of individual qualifications.

---

[2] PhillipsKPA, Contextual Research for the AQF Review, Commonwealth, 2018

Timeline

Public consultation   February 2019

Submissions due   15 March 2019

Report to governments   July 2019

Implementation plan developed   August 2019

Review completion   30 September 2019

The Panel will consult further once recommendations and the implementation plan are developed.

How to make a submission

To make a submission use the submission form and email it to AQFReview@education.gov.au **by 15 March 2019**.

Please limit your response to no more than 3000 words.

2. Evolution and use of the AQF

The AQF was developed to promote transparency and linkages across the education sectors

The AQF was introduced in 1995, replacing the former Register of Australian Tertiary Education (RATE), while drawing in elements from the Australian Standards Framework (ASF). The ASF was a vocational system of levels developed as part of the transition to competency-based training. The AQF's first six qualifications were aligned to the first six levels of the ASF, while all the Bachelor Degree and above qualifications were carried over from the RATE.[3]

In Australia, a number of factors figured in the development of the AQF. The VET system was being reformed to adopt competency-based training, prompting a need for nationally recognised VET qualifications linked to competency standards. More students were completing Year 12 and there was rapid growth in the tertiary sector. This highlighted a need for greater consistency and transparency between qualifications to support recognition of prior learning (RPL) and credit transfer.

In its initial form, the AQF was a relatively loose framework.[4] It reflected the characteristics of the existing qualification types issued in each sector, with learning outcome levels embedded in the qualification types.

The qualifications were grouped by sector and had descriptors of knowledge applying within the sector. This was in contrast to the consistent levels-based taxonomies of learning and skills used in other countries, that the AQF would adopt from 2011.

AQF objectives to help promote a more coherent tertiary system have not been realised

The 2008 Review of Higher Education (Bradley Review) proposed that Australia should develop a more coherent tertiary education system. It noted the need for a continuum of tertiary skills and recommended a single regulator and funding source for the VET and higher education sectors. It also proposed a review of the AQF, noting the weaknesses of the AQF at the time. The Review of the AQF took place between 2009 and 2011 under the authority of the AQF Council, which was established as a result of stakeholders wanting "a stronger custodian of a stronger AQF."[5]

In 2011, a revised AQF was implemented with features outlined in Section 1, including a more consistent taxonomy of learning outcomes. The taxonomy was applied to both levels and qualifications, making the AQF a more detailed and complex document.

These changes envisaged enhanced governance arrangements for an AQF body to ensure compliance with the AQF. However, instead of the more integrated tertiary education system recommended by the Bradley Review, different regulatory systems have continued to evolve under separate national regulators for higher education[6] and VET[7] Provider standards in both sectors reference the AQF but arguably reinforce sectoral differences in qualification purpose, design and methods of teaching.

---

[3] AQF Council, Equivalency of pre-AQF qualifications

[4] Keating, Jack, Qualifications frameworks in Australia, *Journal of Education and Work* 16 (3), 2003, pp. 271-288

[5] AQF Council, Strengthening the AQF: A Proposal, 2009, p. 7

[6] The Tertiary Education and Quality Standards Agency (TEQSA) was established in 2011.

[7] The national regulator for VET, the Australian Skills Quality Authority (ASQA) was established in 2011.

Differences between the VET and higher education sectors are also evident in levels of funding and enrolments, exacerbated by the reputational damage to the VET sector flowing from the practices of some providers.

These trends and developments have limited the effectiveness of the revised AQF in achieving greater coherence across Australia's tertiary education system. Various reports show that there is now renewed interest in a more coherent tertiary sector.[8] The AQF could provide further support for a more coherent tertiary system, but funding and governance systems would need to be re-examined for the benefits of the AQF to be fully realised.[9,10]

An important but separate development has been the ongoing growth in VET courses as part of senior secondary certificates.

The AQF is widely used

People who develop, issue and accredit qualifications are the main users of the AQF. Other users are professional bodies, industry, unions, licensing authorities and governments. The AQF can assist students, particularly international students, by showing the relationship between qualification types in Australia, which may help with study choices.

Many pieces of legislation refer to the AQF in diverse areas such as migration, international education, civil aviation, childcare, defence, disability care, family law, finance, patents, social security, tax, telecommunications, trademarks and workplace relations, as well as education (See Figure 1). Around 20 industrial awards refer to the AQF and around 90 industrial awards refer to AQF qualifications.

The Panel is aware that changes to the AQF may have far-reaching impacts, including for industrial awards, migration rules and Australia's international education sector. Diagram 1 indicates the AQF's reach.

[8] Business Council of Australia, Future-Proof: Protecting Australians Through Education and Skills, October 2017, p. 31

[9] KPMG, Reimagining tertiary education: From binary system to ecosystem, 2018, pp. 1-4

[10] Business Council of Australia, Future-Proof: Australia's future post-secondary education and skills system, August 2018, pp. 12-17

Figure 1: Areas impacted by the AQF
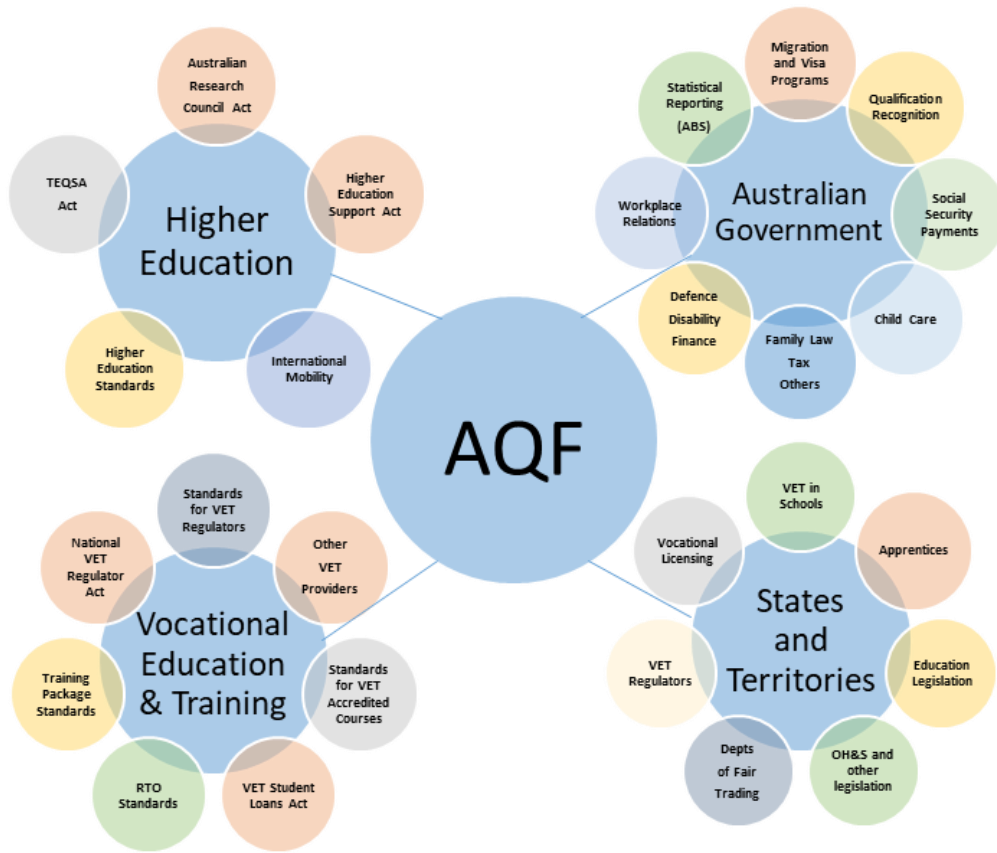
3. Major contextual issues for the Review

Skills and knowledge are increasingly important

Now more than ever, skills and knowledge that are current are important to our economy and society. People use them to take part in work, learning and community activities. When applied well, skills and knowledge can help improve workforce productivity. With current skills and knowledge, people have better job security, income and job satisfaction, which affect quality of life. The Department of Jobs and Small Business forecasts that most jobs growth over the next five years will be in areas that often need post-school qualifications.[11]

Qualifications, as well as experience, help to get jobs

Qualifications show employers and others what the holder is capable of and has achieved. Education providers warrant through qualifications that learners have achieved learning outcomes at or above the required standard. Graduates use qualifications to show their achievements and seek advancement; and employers and the wider community perceive them as indicators of achievement and potential performance.[12]

Qualifications may have intrinsic value flowing from the status of the education provider and economic or exchange value to do with job outcomes linked to the qualification.[13] Employers think that qualifications show greater ability to learn and acquire skills, but are a weaker signal of initial job competence.[14] Qualifications are not the only signal of achievement - roughly, two thirds of job vacancies require some level of experience.[15]

In the last five years, most growth has been in jobs that generally require post-school qualifications. People with higher AQF level qualifications (degree or above) tend to have higher employment rates and earn more; although some jobs requiring lower AQF level qualifications can also attract high pay.[16]

Employers may use qualifications to select between job seekers.

The nature of work is changing

Technology, demographic shifts, and globalisation are changing the way we work.[17] Changes in the way we work will affect the skills and knowledge that graduates need and the ways that providers deliver education, which in turn need to be reflected in the AQF.

Technological change is leading to fewer manual and routine jobs, driving growth in professional and technical fields and a move from physical skills to interpersonal, creative and decision-making skills.[18]

---

[11] Department of Jobs and Small Business, Australian Jobs 2018, 2018, p. 32

[12] Oliver, Beverly, Better 21C Credentials Evaluating the promise, perils and disruptive potential of digital credentials, 2016, p. 1

[13] NCVER, Qualifications use for recruitment in the Australian labour market, 2005, p. 7

[14] NCVER, Qualifications use for recruitment in the Australian labour market, 2005, p. 8

[15] Department of Jobs and Small Business, Australian Jobs 2018, 2018, p. 36

[16] Department of Jobs and Small Business, Australian Jobs 2018, 2018, p. 32

[17] Ithaca Group, Credit Pathways in VET and Higher Education, 2018, p. 131

[18] Department of Jobs and Small Business, Australian Jobs 2018, 2018, p. 29

Australia's ageing population will mean a shrinking workforce and skill pool as a proportion of the population, while increasing the demand for professional and interpersonal skills in healthcare and social assistance.

Globalisation and a more mobile labour market mean greater competition from skilled workers overseas and this places pressure on Australian firms through labour costs and supply chains.[19]

The competition for existing and shifting markets due to globalisation, and loss of population from regional areas are affecting regional and Indigenous populations. Regional areas tend to have a higher proportion of older people. Younger adults moving to large cities from other areas for education, employment and other opportunities contribute to an increase in the proportion of older people in regional areas.[20]

Improving levels of educational attainment is critical to effective social and economic participation and to redressing disadvantage.

As some tasks are automated and others move overseas, people are more likely to have a number of jobs or careers. People will need to retrain, upskill and maintain skills through a process of lifelong learning that is adaptable and responds to industry needs.

The AQF should recognise new skills and learning methods

As knowledge and skill requirements shift due to the changing nature of work, learners will not only need to master different content but also access different learning opportunities.

As noted above, there is more demand for professional and technical skills and interpersonal and creative skills. This paper refers to them as enterprise and social skills. Enterprise and social skills are not specific to any job role. They include skills to deal with technology and data and skills to work with people and cope with change. It is essential that all young people and adults returning to study are given opportunities to acquire the skills and capabilities required for the future workforce.[21]

Because workplace change may require more reskilling or upskilling, people want faster, cheaper, self-directed[22] and on-demand learning.[23] Employers prefer shorter, sharper education and training,[24] but to supplement, not replace, a full qualification like a Certificate III or a Bachelor degree.[25]

For more information about enterprise and social skills, read changing work requires new skills and learning methods.

[19] Ithaca Group, Credit Pathways in VET and Higher Education, 2018, p. 138

[20] ABS, Census of Population and Housing: Reflecting Australia - Stories from the Census, 2016

[21] Foundation for Young Australians (FYA), The New Work Reality, 2018, p. 9

[22] EY, Can the universities of today lead learning for tomorrow? The University of the Future, 2018, p.11

[23] Ai Group, Connecting for Productivity: University and industry partnerships, 2016, p.3

[24] Ai Group, Connecting for Productivity: University and industry partnerships, 2016, p. 9

[25] Business Council of Australia, Future-Proof: Australia's future post-secondary education and skills system, August 2018, p. 6

4. Areas for possible change

4.1 A wider range of credentials could be included in the AQF

AQF qualification types have not changed since 2011. This section discusses whether credential types that are not included in the AQF, including micro-credentials, should be brought into the AQF structure, and how they could be included.[26] The AQF would continue to recognise the important role of full qualifications in providing a broad, foundation education in vocations and disciplines.

This paper refers to the credentials that are considered for inclusion in the AQF as 'shorter form credentials'.

These credentials are often shorter than AQF qualifications. They typically address a particular form of knowledge or skill, enable admission into further education, or attest the completion of component parts of a full qualification or some previous learning or study. Some shorter form credential types that are currently offered within the Australian education environment are related to AQF qualifications but are not qualification types in the AQF. These include:

- skill sets
- short courses (in VET these are based on accredited units of competency and termed a 'course in (subject))'
- incomplete qualifications.

A second group of shorter form credentials prepare people for entry to AQF qualifications, sometimes with credit. They include:

- enabling and foundation courses (that are focussed on university admission or the provision of core skills such as numeracy and literacy)
- Massive Open Online Courses (MOOCs) that provide credit toward AQF qualifications.

Other shorter form credentials have no specific relationship with current AQF qualifications and include:

- short courses (non-curriculum-based higher education and VET short courses)
- micro-credentials
- MOOCs (that do not provide credit to existing qualifications)
- professional and vendor courses such as finance and information technology courses.

For more information about these credentials, and whether they could be included in the AQF, read incorporating shorter form credentials in the AQF.

Many shorter form credentials provide a work or discipline related outcome. Others, such as enabling, foundation and pre-apprenticeship courses, are undertaken to access further study that in turn will provide a work or discipline related outcome. This variety of purposes, and therefore learning outcomes, may need to be recognised if these credentials are included in the AQF.

---

[26] For the purposes of this paper, a micro-credential is a modular certification in a specific topic area of learning. A micro-credential may be granted in response to a demonstration of existing skills or upon completion of an assessed form of learning.

Some qualifications are designed to allow people who do not complete them to exit with a recognised AQF qualification. These 'nested' qualifications are allowed for in the AQF. Under such programs, students completing one year of a three-year Bachelor qualification could receive a Diploma and students completing two years could receive an Associate Degree. These products can also be 'flipped' so that a completed Diploma can provide credit towards one year of an Associate Degree, which in turn can provide credit towards two years of a three-year Bachelor degree.

Why shorter form credential types could be included in the AQF

PhillipsKPA found that there are no means within the Australian education system to quality assure credit towards formal qualifications for in-service or informal learning, or micro-credentials, in a consistent way.[27] The University of Melbourne believes that the development of robust, scalable and innovative approaches to recording credit, most likely involving new technological innovations such as 'blockchain' data banks, will be crucial to supporting the validity and acceptance of shorter form qualifications such as micro-credentials.[28]

Opening up the option for organisations to seek recognition of shorter form credentials through the AQF would make them part of the existing quality assurance mechanism. This could give providers more confidence and capacity to grant credit for those credentials towards full qualifications.

Including shorter form credentials in the AQF could make their relationship to existing Australian qualifications transparent. It may also help these credentials to be recognised in Australia and internationally.

Employers and workers are looking for credentials that are affordable and timely, that can help people to retrain and upskill as the workplace changes. The Productivity Commission believes that the rise of micro-credentials needs a framework to certify and quality assure these courses.[29]

The Review will consider whether the AQF should ensure sufficient flexibility to recognise faster, more cost effective learning opportunities, including self-directed and on-demand learning. Such 'shorter, sharper' education and training could sit alongside core VET and higher education qualifications and the SSCE, which would remain the source of foundation education in skills and disciplines.

Shorter form credentials would need to meet minimum requirements to be included in the AQF

To be included in the AQF, currently a qualification type must:

1. be able to be quality-assured under government approved standards

2. be able to be accredited by an authority authorised under legislation

3. be described according to the AQF descriptions of learning outcomes (knowledge, skills, the application of knowledge and skills and generic learning outcomes)

4. be able to be located at an existing AQF level

5. have clear pathways within the AQF

6. not duplicate an existing AQF qualification type

7. meet a defined industry, professional or community need. [30]

---

[27] PhillipsKPA, Contextual Research for the AQF Review, 2018, p.10
[28] University of Melbourne, Micro-credentialing
[29] Productivity Commission, Shifting the Dial, 2018, p.100
[30] AQF Council, Australian Qualifications Framework Second Edition, 2013, p. 87

With some adaptation to account for the nature of short study, these criteria could be used to help decide what shorter form credential types could be included in the AQF.

Some shorter form credentials could be quality assured

Some shorter form credentials would readily meet the first criterion for inclusion in the AQF referred to above – be able to be quality assured under government approved standards – and the second criterion – be able to be accredited by an authority authorised under legislation. However, new processes would be needed to enable other shorter form credentials to meet these two criteria.

Some shorter form credentials are already regulated (and therefore accredited) and quality assured, and so meet the criterion for quality assurance. Shorter form credentials that are already regulated include VET Skill Sets, VET short courses titled 'Course in (subject)' and incomplete qualifications in either the VET or higher education sector.

Some shorter form credentials would meet the requirement for quality assurance because regulated providers deliver them. Accredited tertiary providers are regulated and must comply with the Higher Education Standards Framework (Threshold Standards) 2015 (HESF)[31] or the Standards for Registered Training Organisations 2015 (RTO standards)[32] or both. The HESF and the RTO standards provide for the quality of accredited tertiary education providers, including their course provision and teaching. However, they do not provide specifically for the quality of courses of study that are not either AQF qualifications or Nationally Recognised Training.

Including higher education shorter form credentials in the AQF would automatically bring them into a quality assurance regime. If they were included in the AQF and aligned to one or more of AQF Levels 5 to 10, they would fall under the HESF's quality assurance requirements when delivered by a higher education provider.

Including shorter form credentials in the AQF would not bring them under the RTO Standards, unless they complied with Nationally Recognised Training requirements. Therefore, it would be necessary to introduce a way of quality assuring and accrediting shorter form credentials that are not regulated in the VET sector if they were to be included in the AQF.

It would also be necessary to introduce a way of quality assuring and accrediting professional and vendor courses delivered by industry through providers that are not regulated, such as information technology credentials, if they were to be included in the AQF.

However, inclusion of any shorter form credentials in the AQF should be driven by learner needs and provider responses to those needs, and not by an intention to expand the scope of programs subject to formal regulation and quality assurance through the AQF.

It is possible to assign some shorter form credentials to an AQF level

It may be difficult to assign credential types that are defined by their means of delivery, such as MOOCs, or by their purpose, such as enabling courses, to a single AQF level. The Irish and Scottish frameworks assign their shorter form credential types across a number of levels. This approach could be considered for Australia. For example, a MOOC could be delivered at any AQF level, provided the minimum requirements to be included in the AQF identified above are met. This is because MOOCs can vary in complexity depending on the subject matter and the breadth and depth of material covered.

---

[31] Commonwealth of Australia, Higher Education Standards Framework, 2015
[32] Commonwealth of Australia, Standards for Registered Training Organisations, 2015

However, it would be necessary to have a way of assigning an individual credential, such as a MOOC in project management, to a single AQF level. This would allow students and employers to understand the level of complexity of learning to be achieved.

Regulated shorter form credential types are often directly or indirectly associated with an AQF level. For example, it may be possible for units of incomplete qualifications to be assigned to the level of the complete qualification - units from an incomplete bachelor's degree could be assigned to AQF Level 7. There may be limitations to this approach given not all units in a qualification reflect the level of learning outcomes of the final qualification.

It may be more difficult to assign shorter form credential types that are not regulated to a specific AQF level. Some other countries have set up new organisations, or asked existing ones, to quality assure shorter form credentials and assign them to a level in their frameworks. For example, the New Zealand Qualifications Authority is assessing applications for approval of micro-credentials not delivered by a non-tertiary education provider and aligning them to a NZQF level.[33]

Other countries have ways to include shorter form credentials in their qualifications frameworks

Some countries have qualifications frameworks that include shorter form credentials. A feature of the Danish,[34] Scottish,[35] and Irish[36] systems is that they group shorter form credentials according to their purpose. For example, the Scottish framework includes Professional Development Awards that develop skills for people who are already employed and want to extend or broaden their skills. It also includes National Certificates that prepare people for employment, career development or more advanced study. Similarly, the AQF could include shorter form credentials that meet a range of purposes including preparation for work, preparation for further study, skills and knowledge extension building on a previous award, as well as general interest.

In some instances, shorter form credentials are related to major qualifications. For example, Scotland Ireland and Denmark have types of credentials that prepare for or extend major qualifications, as well as shorter form credentials that can stand alone. Defining shorter form credentials in relation to major qualifications could help to introduce aggregated or 'stackable' qualifications based on the achievement of a number of shorter form credentials.

Shorter form credentials could be included in the AQF using a matrix that includes the 10 AQF levels. Existing AQF qualifications would be listed against the levels. Alongside the existing qualifications, shorter form credentials types would be listed horizontally and aligned against a number of appropriate AQF levels. The complexity of the credential type would provide the basis of the level alignment rather than its length or whether it is from the VET or higher education sector.

New Zealand has recently recognised micro-credentials without including them in its qualifications framework. Instead, they stand outside the framework but are accredited by the New Zealand Qualifications Authority (NZQA). For accreditation by the NZQA, micro-credentials are required to address a need not already met in the tertiary education system, and that industry, employers, or the community support.[37] If this approach were to be adopted in Australia, education regulators would need to recognise the credentials. New Zealand is now reviewing its qualifications framework and will consider including micro-credentials within the framework.

---

[33] New Zealand Qualifications Agency, Micro-credentials system launched, 2018
[34] Denmark Ministry of Higher Education and Science, Types of Certificates and Degrees
[35] SQA, Qualifications
[36] Quality and Qualifications Ireland (QQI), Descriptors, 2013
[37] New Zealand Qualifications Agency, Micro-credentials system launched, 2018

For more information about other countries' ways of incorporating shorter form credentials in qualifications frameworks, read other country examples.

Possible approaches

- Include shorter form credentials in the AQF.

- Use the existing criteria for adding a qualification type to the AQF, possibly adapted for shorter form study, to determine whether shorter form credential types should be added to the AQF.

- Align shorter form credential types to AQF levels by assigning them across a number of applicable AQF levels.

- Determine what groupings of shorter form credentials are required, and create them as credential types in the AQF.

- To help to aggregate shorter form credentials into qualifications, create a shorter form credential type that is defined by its link to a qualification type.

4.2 The treatment of enterprise and social skills could be clarified in the AQF

Section 4 describes the growing demand for enterprise and social skills. There is strong support for graduates to acquire these skills as well as their vocational or discipline-based skills. This section explores whether and how enterprise and social skills should be included or referenced in the AQF. The key issue is the extent to which these skills should be specified in the AQF or reflected in individual qualifications depending on the purpose of the qualification.[38]

There are many enterprise and social skills

Increasing demand by employers for workers with well-rounded skills is recognised by the proposed VET training product reforms. Proposed training product reforms suggest three types of skills necessary for future VET graduates. They are technical skills, foundational skills like literacy, numeracy, and digital literacy, and future work skills.[39] Similarly, for example, the Australian Technology Network universities are offering courses in skills such as leadership and communication that will help research students be better prepared for the workplace.[40]

There is no, one accepted list of enterprise and social skills and many are not new. As shown in Table 1, enterprise and social skills may include skills for interacting with people like communication, empathy, creativity[41] and values and behaviours like accountability, honesty, work ethics, collaboration and resilience[42]. They also include skills needed to work with and benefit from technology.

---

[38] Foundation for Young Australians, The New Work Reality, 2018, p. 9

[39] The Department of Education and Training, Training Product Reform: What is the case for change?, 2017, pp. 8-9

[40] ATN, e-Grad School

[41] Productivity Commission, Shifting the Dial: 5 year Productivity Review, 2017, p.87

[42] BCA, Future-Proof: Australia's future post-secondary education and skills system, p.41

Table 1: Some enterprise and social skills			
Interpersonal & Human Intelligence	**Growth**	**Digital**	**Data**
• Collaboration • Communication • Creativity • Critical Thinking • Empathy	• Adaptability • Resilience • Global Mindset • Learning Agility	• Digital Fluency • Interaction & Connectedness • Digital Design	• Data Literacy • Data Science • Insights to Action

Adapted from: World Economic Forum (2018)[43]

There is no settled way of teaching and assessing many enterprise and social skills.

Experts debate the extent to which enterprise and social skills are personal attributes as opposed to skills, and the best way to acquire them. Some say enterprise and social skills are best acquired through mastering specific disciplines or fields of vocational expertise,[44] because they are partly context or content dependent.[45] Others say they can be taught and assessed independently,[46] with the method of assessment dependent on the type of skill[47].

As the AQF is a framework for qualification types, social and enterprise skills should be able to be:

- related to the core content of the qualification
- acquired through the process of learning and teaching
- assessed and reported in ways that are fair, valid and reliable.

To know more about the debate around enterprise and social skills, read changing work requires new skills and learning methods.

Some enterprise and social skills are included in the AQF

The AQF currently sets out certain non-discipline specific generic skills that students can acquire through learning that include some enterprise and social skills.[48] They are fundamental skills (literacy, numeracy), people skills (working with others, communication), thinking skills (learning to learn, decision making, problem solving) and personal skills (self-direction, acting with integrity). The AQF states that application of these generic skills is specific to the education or training sector.

The AQF variably incorporates its generic skills in the level and qualification descriptors. The descriptors refer to communication, some form of problem solving and autonomy. Only the learning outcomes for the senior secondary certificate of education include fundamental skills such as literacy and numeracy. While school should provide a foundation of literacy and numeracy, tertiary education may be expected to expand these skills.

---

[43] World Economic Forum, Operating Models for the Future of Consumption, January 2018, p. 17

[44] Buchanan, J et al., Preparing for the Best and Worst of Times, 2018, p. 20

[45] Lamb, S. et al., Key Skills for the 21st century an evidence-based review, 2018, p. 4

[46] NSW Department of Education, Education: Future Frontiers Opportunities and challenges for education, 2018, pp. 5-6

[47] Lamb, S. et al., Key Skills for the 21st century an evidence-based review, 2018, p. 4

[48] AQF Council, Australian Qualifications Framework Second Edition, 2013, p. 11

Many enterprise and social skills shown in Table 1 are not included in the AQF taxonomies and employers do not see evidence of these skills on records of results. There may be a case for replacing the current limited definition of generic skills in the AQF with a broader, more current list of enterprise and social skills in the AQF, noting that the focus on different enterprise and social skills may change over time.

The application of enterprise and social skills is dependent on context

Even with a broader list, the application of enterprise and social skills will be dependent on the specific discipline or vocational *field* (context) in which they are applied. For example, effective problem solving skills used by a pre-school teacher to overcome the regular challenges of managing a pre-school classroom could be entirely different to the problem solving skills used by a mining engineer to solve the problem of an uncontrolled fire on an oilrig.[49]

The AQF currently suggests that the application of enterprise and social skills is specific to the education or training sector.[50] However, many occupations span the sectors and people progress through them. This suggests that social and enterprise skills relate more to qualifications in the same fields of study rather than to the sector in which they are delivered.

Further, because enterprise and social skills appear to be context dependent, it is likely not possible or appropriate to present them in a taxonomy that applies to all qualifications, and for them to be learned and assessed at different levels.

It would therefore seem appropriate to amend the AQF reference to sector dependence when applying enterprise and socials skills. It possibly could be replaced with guidance on how specific enterprise and social skills could be applied in different qualifications - having regard to the purpose and discipline of the qualification and the primary learner cohort for whom the qualification is intended.

With this approach the range of social and enterprise skills would need to be regularly reviewed and updated.

Possible approaches

- Specify that social and enterprise skills in AQF qualifications should be able to be:
    - taught in the context of the qualification's core content
    - acquired through the process of teaching and learning
    - assessed and reported in ways that are fair, valid and reliable.
- Expand the list of enterprise and social skills included in the AQF and provide guidance or advice about delivering them through various qualifications (but do not include these skills as a taxonomy).

---

[49] Buchanan, J. et al., Future Frontiers Analytical Report: Preparing for the best and worst of times, 2018, p. 25
[50] AQF Council, Australian Qualifications Framework Second Edition, 2013, p. 11

4.3 AQF taxonomies and levels

Remove duplication of descriptors

Most qualifications frameworks internationally are based on a hierarchy of levels. Each level sets out learning outcomes that show how learning progresses along a continuum of complexity. Qualification types are assigned to a level that describes the learning outcomes a student should achieve. Descriptors state the features of each level and qualification type.

Unlike frameworks in other countries, the AQF has descriptors of knowledge and skills and their application for both levels and qualification types. Sometimes the descriptors for levels and qualification types repeat or contradict each other, which AQF users can find confusing.[51]

Most other countries use level descriptors, not the descriptors for qualification types, to outline knowledge and skills. They then use the qualification type descriptors to describe other qualities that apply to qualification types only, such as credit arrangements.

In Australia, descriptors for qualification types can help with recognition of Australian qualifications overseas. This is the case where AQF level descriptors do not help to differentiate qualification types at the same level - for example to explain the difference between a Bachelor Honours year and a Graduate Certificate at Level 8. The Review would consider what features need to be described for qualification types to help with international recognition.

For the current AQF, Tables 2 and 3 show the difference in qualification type descriptors if the AQF was to describe knowledge and skills for levels only, and describe other features for qualification types. Under this approach, all qualifications assigned to the same level would use the same knowledge and skills descriptors.

Table 2: Current AQF descriptors *with duplication* between levels and qualifications	
Level Descriptors	**Qualification Type Descriptors With Duplication**
• Summary	• Purpose
• **Knowledge**	• **Knowledge**
• **Skills**	• **Skills**
• **Application of knowledge and skills**	• **Application of knowledge and skills**
	• Volume of learning
	• Pathways
	• Responsibility for accreditation and development
	• Authority to issue the qualification

---

[51] PhillipsKPA, Contextual Research for the AQF Review, 2018, p. 64

Table 3: Current AQF descriptors *with no duplication* between levels and qualifications	
Level Descriptors	**Qualification Type Descriptors With No Duplication**
- Summary **Knowledge** **Skills** **Application of knowledge and skills**	- Purpose - Volume of learning - Pathways - Responsibility for accreditation and development - Authority to issue the qualification

Possible approach
- Use AQF levels only to describe knowledge and skills and their application, and provide a description of each qualification type that is linked to levels.

Revise the AQF taxonomy, particularly in application of knowledge and skills

Taxonomies in qualifications frameworks describe learning outcomes at different levels of complexity. Like many other qualification frameworks, the AQF taxonomy currently describes learning outcomes in three domains:

- knowledge
- skills
- application of knowledge and skills.

These describe what people know, what they can do and the context in which skills and knowledge are applied.

There are reasons to revise the AQF taxonomy:

- current descriptors are unclear (see below)
- application of knowledge and skills is dependent on context
- the number of levels in the application of knowledge and skills domain may reflect assumptions about highly structured occupational hierarchies and work responsibilities that are dated in terms of modern flatter workplace structures.

Application of knowledge and skills varies across qualification types even at the same level. It does not necessarily increase in complexity with the level of knowledge and skills, as would be expected in a taxonomy. Level of autonomy is one of the descriptors of application of knowledge and skills. Many people with trades qualifications (Level 3) and Diplomas and Advanced Diplomas (Levels 5 and 6) work with much higher levels of autonomy and responsibility when they graduate than people with degree and post-graduate qualifications (Levels 7 and above).

The level of autonomy and responsibility achieved by some qualifications at lower AQF levels appears to be understated in the AQF. This may help to create and perpetuate poor perceptions of the outcomes from some qualifications provided in the VET sector.

It may be necessary to have a means of defining the context for learning outcomes, such as autonomy and responsibility, in the application of knowledge and skills domain of the AQF taxonomy. For

example, it may be the case that graduates of qualifications that have occupational outcomes and involve on the job learning, or have professional licensing requirements, may have a greater degree of autonomy in the relevant field after completing their study than other graduates.

The number of AQF levels may impose the need to develop artificial distinctions in knowledge and skills and the application of knowledge and skills in order to differentiate between the levels. The Review will consider whether all descriptors need to be differentiated between all levels, or whether to include only learning outcomes that can be differentiated across 10 levels.

Recognising the value of VET and higher education

Preliminary consultations indicate that many people think of the AQF as a ladder with VET qualifications at the bottom of the ladder and higher education qualifications at the top, creating an implied hierarchy that values higher education over VET. There are vocational qualifications in both the VET and higher education sectors, so the vocational nature of the qualification is not the reason for these perceptions.

It is difficult to overcome the perception of a hierarchy of qualification types in the AQF given that qualifications frameworks are based on a taxonomy of increasing levels of skills and knowledge and the application of skills and knowledge.

In Australia and many other countries, perceptions of prestige between the higher education and VET sectors also reflect broader social and cultural attitudes. These may have been exacerbated in Australia by funding and policy differences between the sectors over the past decade. These perceptions are not likely to be altered merely by presentational or even design changes in the AQF as some have suggested.

The level at which qualifications are set is the responsibility of qualifications developers. Likewise, linkage of qualifications to specific occupations through industrial awards, for occupational licensing or professional certification is the responsibility of the parties to awards, occupational regulators and professional bodies.

However, as discussed above if the AQF taxonomy does not accurately reflect the level of autonomy and responsibility of some VET sector qualifications, the process of alignment of qualifications to levels may be constrained and may reflect broader social and cultural attitudes about these qualifications.

If there are other issues in the design of the AQF that adversely affect the relative status of VET and higher education, these can be considered by the Review.

> **Possible approach**
> - Review the application of knowledge and skills domain of the AQF taxonomy and how it should be applied across the AQF levels.

Some qualification types may not conform to their AQF level descriptors

The AQF indicates that Level 1 graduates will have knowledge and skills for initial work and Level 2 graduates will have knowledge and skills for work in a defined context.[52] However, Certificate I and II graduates mostly report that they gain no improvement in employment after training.[53] They have lower weekly earnings than students who left school at Year 9 or below and their unemployment rate is higher than for Year 10 school leavers.[54]

Qualification types at the same AQF level are meant to be of the same level of complexity. PhillipsKPA reports concern by some stakeholders that Graduate Certificates and Graduate Diplomas at Level 8 are not of the same level of complexity as the Bachelor Honours year, which is also at Level 8.[55] Some stakeholders also think that the Masters by research and Masters by coursework qualification types at Level 9 differ in complexity.[56]

Some countries require each qualification type to have a minimum amount of content at a certain level. For example, in New Zealand, a Level 6 Diploma must contain at least 120 credits from Level 5 or above with at least 72 credits being Level 6 or above.[57] Setting a type of pre-requisite requirement (with or without the use of credit points) may help to achieve a more consistent level of complexity between qualification types at the same level. It would not necessarily ensure that a qualification type was assigned to the right level in the first place. However, if there was a requirement for a graduate certificate to contain a certain amount of Level 8 content, it may address the issue of some graduate qualifications teaching primarily undergraduate units.

A related issue exists at AQF Level 3, as there is no distinction between trade and non-trade Certificate III qualifications. Some stakeholders are of the view that some trade graduates will have skills, knowledge, and decision-making more closely aligned to Level 5.[i]

There are issues around dual sector qualification types

There are both VET and higher education qualification types at AQF Levels 5, 6 and 8. The AQF used to distinguish between VET and higher education qualification types at Level 8, but this ceased in 2013.

The Tertiary Education Quality and Standards Agency (TEQSA) and the Australian Skills Quality Authority (ASQA) have indicated that the lack of distinction between VET and higher education offerings at AQF Level 8 causes difficulties. There is no guidance in the AQF for providers and regulators to help determine whether a Level 8 qualification should be accredited in the VET or higher education sectors.

TEQSA has noted that some VET sector providers who want their Level 5 and 6 higher education qualifications to be given full credit for entry into a higher award do not understand the additional course design requirements of higher education. For this reason, it believes the credit that could be provided into a higher education award should be different for holders of a higher education Diploma compared to holders of a VET Diploma.

This issue will be further considered with the sector regulators during the consultation process. However, returning to sector based qualification types would contradict the need to ensure greater coherence and improve pathways across the tertiary education system.

[52] AQF Council, Australian Qualifications Framework Second Edition, 2013, p. 12

[53] NCVER, National Student Outcomes Survey, 2018

[54] Commonwealth Department of Jobs and Small Business, personal communication

[55] PhillipsKPA, Contextual Research for the AQF Review, 2018, p. 82

[56] PhillipsKPA, Contextual Research for the AQF Review, 2018, pp. 83-85

[57] New Zealand Qualifications Authority, New Zealand Qualifications Framework, p. 13

Revise descriptors to improve clarity

PhillipsKPA's report states that users find that the AQF descriptors are unclear. Some terms are ambiguous, skill descriptors are applied inconsistently across levels or qualifications, differences between levels are unclear and sometimes terms are used at lower AQF levels that imply greater complexity than terms used at higher levels. For example, the knowledge descriptor at Level 5 states:

> *Graduates at this level will have technical and theoretical knowledge in a specific area or a broad field of work and learning*

and the knowledge descriptor at Level 6 states:

> *Graduates at this level will have broad theoretical and technical knowledge of a specific area or a broad field of work and learning.*[58]

Clarity could be improved by having knowledge and skills descriptors for AQF levels only and not for qualification types. Other possible ways of improving clarity include expanding the glossary of terms and emphasising the difference between levels rather than similarities. The proposal to review the application of skills and knowledge taxonomy will also help to improve clarity.

Possible approaches
- Revise descriptors to simplify them and ensure clear distinctions between levels.

4.4 Senior secondary school certificates

Most countries include school education in the levels of their qualifications frameworks. Some include both primary and secondary school (Denmark, Ireland, and Mexico) but most focus on secondary school.[59] Australian senior secondary certificates of education (SSCE) are in the AQF, but are not assigned to an AQF level.

This section explores how the AQF could better reflect the role of the SSCE as a pathway to further education, training and employment.

Secondary school graduates may have some knowledge and skills from multiple AQF levels

Previous work has found the SSCE to be equivalent to Certificate III [60] or that the majority of learning outcomes are at Level 3.[61] However, depending on the type of SSCE,[62] the subjects studied and the level of achievement gained, an Australian secondary school graduate could have gained knowledge and skills from several AQF levels.

Secondary school students can study VET Certificates I, II or III (AQF Levels 1, 2 or 3). In some states, Year 11 or 12 students can study Certificate IV (Level 4) and VET Diploma (Level 5) courses, although they make up only 2.8 per cent of all students doing VET.

Further, some graduates with an ATAR, or a Certificate IV in Tertiary Preparation, are deemed to have

---

[58] AQF Council, Australian Qualifications Framework Second Edition, 2013, pp. 12-13

[59] PhillipsKPA, Contextual Research for the AQF Review, 2018, p. 20

[60] Lim, P, and Karmel, T, 2011, National Centre for Vocational Education and Research, The Vocational Equivalent to Year 12, Longitudinal Surveys of Australian Youth, 2011, p.10

[61] AQF Council, Strengthening the AQF, Consultation paper, July 2010, p. 20

[62] Including the International Baccalaureate, vocation-based certificates, such as the Victorian Certificate of Applied Learning (VCAL), SSCEs that lead to an ATAR and those that do not lead to an ATAR.

knowledge and skills suitable for entry to an AQF Level 7 Bachelor Degree. Some universities also provide credit to SSCE graduates for particular subjects.

This suggests that the SSCE does not neatly align with a single level of the AQF.

Should the SSCE be assigned to an AQF level or levels?

The previous review of the AQF did not assign the SSCE to an AQF level because it was unable to decide on a single level agreed by schools, the tertiary sector and industry.

Some universities have suggested that the AQF should more clearly align the SSCE with AQF levels.[63] If the SSCE is aligned to an AQF level or levels, it may prove easier for tertiary providers to recognise the potential level of knowledge and skills a student obtains at school to prepare them for tertiary studies. This may help providers to make decisions about tertiary credit and RPL.

The main reason for assigning a qualification type to a level is to show the level of complexity of learning outcomes achieved at the end of study. As a result, the qualification type is usually assigned to one level. This approach would be challenging for the SSCE due to the variation in level and complexity of learning and outcomes achieved.

As discussed in Section 5.1, some qualification types in other countries are assigned to a range of levels. This is because that qualification type may be designed to address different levels of complexity. For example, a qualification type that builds on the learning of another qualification may differ in complexity depending on whether it is building on a Diploma or Masters qualification.

However, assigning the SSCE as a qualification type to a range of AQF levels may not be appropriate because the level of learning outcomes achieved by SSCE graduates may not easily and directly align with full single or multiple qualification types. Instead, the level of learning outcome achieved is likely to result from the nature of the subject undertaken by students as well as levels of achievement.

The AQF could better reflect the SSCE's role

The purpose of the SSCE is to prepare students for further study or work. This is currently reflected in the AQF, which states that the SSCE 'qualifies individuals with knowledge, skills and values for diverse pathways to further learning, work and effective participation in civic life'.[64]

The AQF could further support the SSCE's purpose by setting out appropriate high-level learning outcomes and showing how the SSCE provides a pathway to employment, and many, but not all, VET and higher education qualifications. SSCE graduates can obtain knowledge in particular subjects that could be considered for credit toward higher education or VET qualifications.[65] Under such arrangements credit could be granted for a designed sequence of study.

Possible approaches

- Revise the SSCE descriptor to recognise that the knowledge and skills acquired in the SSCE can be at a broad range of AQF levels and result in multiple pathways.

---

[63] PhillipsKPA, Contextual Research for the AQF Review, 2018, p. 76

[64] AQF Council, Australian Qualifications Framework Second Edition, 2013, p. 24

[65] For example, performance in HSC languages may enable a year 1 university student to move into year 2 or even year 3 for specific language courses. Some high school courses and subjects can give a student credit towards a TAFE NSW qualification (TAFE NSW Recognition and Credit)

4.5 Volume of Learning

Each qualification type in the AQF has a volume of learning. It states the *typical* duration, in full-time years, of all activities, such as classroom and self-managed learning, needed to achieve the learning outcomes for a qualification. The AQF includes volume of learning to provide a guide to the depth and breadth of learning outcomes for each qualification type. Volume of learning also serves to make qualifications of the one type more consistent and to make different qualification types more distinct.

The AQF's volume of learning explanation guide states that one year of study is equivalent to 1200 hours. It clarifies that the use of 'typical volume of learning' was not intended as justification for not applying the requirement. It also states that:

> *Providers may offer the qualification in more or less time than the specified volume of learning, provided that delivery arrangements give students sufficient opportunity to achieve the learning outcomes for the qualification type, level and discipline.*

> *If the duration of delivery is substantially different from the volume of learning specified by the qualification type specification, providers should be able to provide a pedagogical rationale to support the variation.[66]*

In this manner, volume of learning serves as a reference point, which is reflected in how it is used by the national VET and higher education regulators. ASQA[67] and TEQSA[68] have guidelines that allow providers to deliver a qualification in a shorter time than specified by the volume of learning. This is possible as long as the providers provide a rationale that shows the requirements of the qualification type are still met and students are not disadvantaged.

Some object in principle to volume of learning

Some people think that it is not appropriate to describe volume of learning in the AQF. This is because it describes an input to learning (time) rather than an output (skills and knowledge). In the VET sector, volume of learning is seen as contrary to competency-based training, which allows training to be completed in whatever time is needed to obtain the relevant competencies. However, stating a typical duration does not stop people from completing a course in a different timeframe, as outlined above.

The current presentation of volume of learning

In consultations to date, ASQA has said that the unclear definition of volume of learning is limiting its ability to regulate the sector effectively. ASQA believes that the AQF should give a volume of learning for 'new learners', instead of "typical" learners, as implied by the AQF. 'New learners' could be learners who have no previous tertiary level experience of the subject, either through study or through the workplace. A typical learner might be an average learner, which is difficult to define. Using "new learners" to determine the time required to achieve a qualification would provide a good baseline, against which any lesser time could be justified based on prior learning or experience.

Another issue that affects monitoring volume of learning is that volume of learning includes both classroom (guided) and self-managed learning. It is difficult to assess the amount of self-managed learning that may be undertaken in a qualification.

The Review could consider whether further guidance on this matter is needed. For example, it could

---

[66] AQF Council, Volume of Learning: An Explanation, 2014, p. 2

[67] ASQA, Users' guide to the Standards for Registered Training Organisations 2015, What clauses 1.1 to 1.4 and 2.2 mean for your RTO

[68] TEQSA, TEQSA and the AQF: Questions and Answers, 2016, p. 4

consider whether the AQF could set a minimum proportion of guided learning for each qualification, and set out the types of activities that make up guided and unguided learning, noting that they may be difficult to define and measure.

Not all qualifications can reasonably conform to current AQF qualification types

Volume of learning was introduced to improve consistency within qualification types and help differentiate qualification types. This is a balancing act between reflecting the diversity of existing qualifications, while grouping them into distinct and recognisable types.

A small number of VET qualifications,[69] such as the Certificate II in Security Operations, do not appear to need the volume of learning for even the shortest AQF qualifications (Certificates I and II), which is six months (600 hours). The Australian Security Industry Association Limited (ASIAL), the peak national body representing security professionals in Australia, recommends a delivery and assessment time of 130 auditable hours.[70] Even security courses compliant with the strictest licensing requirements (New South Wales)[71] set a minimum amount of training that is around one sixth of the AQF volume of learning.[72]

If Certificate I or Certificate II qualifications can be delivered in shorter timeframes without affecting course quality, and there is broad agreement that affected courses should remain Certificate Is or IIs, the volume of learning for these qualifications could be changed. Alternatively, new qualification types could be created to accommodate these and other qualifications (for example potentially micro-credentials).

Measuring volume of learning in 'years' is problematic

Using years to measure volume of learning is becoming a problem as modes of delivery shift away from purely traditional classroom learning and semester-based courses to include online, blended and self-paced delivery, as well as trimester-based and accelerated modes of delivery. To address this issue, the AQF could move to using hours as the unit of measurement for volume of learning, either alone or as the basis of a credit points system where credit points derive their value from a certain number of hours of study.

Adoption of volume of learning

The Review may need to re-test the appropriateness of the current volumes of learning, particularly if the unit of measurement changes.

When the current volumes of learning were trialled during the previous AQF review, three quarters of the stakeholders surveyed agreed or strongly agreed with them.[73] However, ASQA found that more than 25 per cent of RTO advertisements for qualifications stated a duration below the minimum of the AQF volume of learning range.[74] ASQA also found that RTOs delivered shorter programs for reasons

---

[69] ASQA, A review of issues relating to unduly short training, 2017, p. 160

[70] ASIAL, Feedback: Addressing issues relating to unduly short courses, 2018, p. 3

[71] ASQA, A review of issues relating to unduly short training, 2017, p. 54

[72] Security Licensing & Enforcement Directorate, NSW Security Licence Course Structure, 2015, p.6

[73] Gilles et al., Empirical validation of the Strengthened Australian Qualifications Framework using Item Response Theory, 2010, p. 33

[74] ASQA, A review of issues relating to unduly short training, 2017, p.4. ASQA also cited information from RTO audits and RTO complaints in its report as reason for concern, but provided little information on these sources in the report.

unrelated to learning methods or student needs. They included learner and employer demand for shorter courses and the cost of programs.[75]

Higher education providers' course of study load data, which is reported in years, shows only a small number of courses that may not comply with the qualification type's volume of learning requirement, covering around 4500 enrolments from a total cohort of 583,627 in 2016.[76] The majority of these students were enrolled in variations of a Graduate Diploma of Legal Practice, which reported a course load of 0.5 years against the prescribed volume of learning of 1-2 years. Stakeholders continue to voice concerns regarding compliance with volume of learning in higher education, and may not be aware that the AQF allows for Masters Degree durations of 1-2 years depending on the circumstances.[77]

An AQF reference credit point system

One of the Review's Terms of Reference is to consider whether volume of learning should be replaced by a credit point system. The Review has identified two approaches for a national credit point system:

- an optional system that is set out only in the AQF and to which providers can match their existing systems

- a national system that is given effect through the AQF and sector standards, and phased in over time.

VET providers do not currently use credit point systems, while higher education providers do. Establishing an optional system would be less of a regulatory burden on higher education providers, and adoption would be driven by it being of value to students and providers. Under this possible approach, volume of learning would still be expressed in hours, with the optional credit points being valued at 1 credit point per 10 hours of learning as occurs in New Zealand and the European Union. Feedback is welcome on this suggestion.

This approach also has implications for student pathways, as an optional AQF credit point system across both the VET and higher education sectors would express learning outcomes for all students in the same currency. The benefits of introducing this system are:

- simplifying comparison of learning outcomes for students and provider staff

- facilitating greater recognition of shorter form qualifications

- expressing the equal importance of both VET and higher education

- allowing easier comparison with international qualifications, as many countries use credit point systems.

---

[75] ASQA, A review of issues relating to unduly short training, 2017, p.139, 145, 149, 155

[76] HEIMS, course of study load and commencing enrolments 2016, Diploma to Doctoral Degree. The examination noted some limitations of the data source, e.g. reporting errors, different methods of reporting trimester teaching periods, and courses with additional entrance requirements of prior learning that shortened the course duration through recognition of that prior learning. Data quality was checked by comparing each provider's submission, or a sample of their submission where appropriate, against their website course descriptions.

[77] An addendum to the AQF Second Edition, which amended the Masters Degree Qualification Type, was published in 2014. This specified that the typical duration of a Masters Research or Coursework Program was 1-2 years. The following text was removed from the qualification type descriptors and added to the volume of learning explanation guide: "In the Masters Degree (Research) and Masters Degree (Coursework) for example, a typical volume of learning for deepening purposes comprises: 1½ years following a level 7 qualification or 1 year following a level 8 qualification; for broadening purposes: 2 years following a level 7 qualification or 1½ years following a level 8 qualification."

Many countries, including in Europe, have implemented national credit point systems that involve a common credit measurement based on hours. PhillipsKPA's contextual research for the Review found that implementing such a system would mirror international practice and facilitate a common currency to support pathways and recognition of non-formal learning.[78]

Possible approaches

- To continue to provide guidance on the breadth and depth of a qualification, change the volume of learning unit of measurement from years to hours.

- To provide a common baseline for volume of learning, base the number of hours for a qualification type on the needs of a new learner.

- To help facilitate pathways between levels and qualifications, develop an hours-based credit point system in the AQF that may be voluntarily referenced by providers.

- To provide a common baseline for credit points, base the number of points for a qualification type on the needs of a new learner.

---

[78] PhillipsKPA, Contextual Research for the AQF Review, 2018, p. 11

5. AQF policies and explanations

The AQF contains four policies, principles for alignment of the AQF, chapters on implementation arrangements and governing and monitoring the AQF, explanations and a glossary.

The AQF is unique in including these policies. Their equivalents in other countries are usually included as separate supporting documents. PhillipsKPA's report proposes that they be removed from the AQF.

5.1 AQF Policies

AQF Qualifications Pathways Policy

One of the purposes of the AQF is to promote pathways between different qualifications, and between education and the labour market. The current AQF Qualifications Pathways Policy was introduced in 2011. Changes to the education sector since then make it necessary to re-examine the need for the Pathways Policy and the role it can play in supporting student transitions.

The AQF Pathways Policy is not the main driver of pathways practice in Australia

Research conducted by Ithaca Group found that pathways practice by providers is mostly guided by the requirements of the HESF and the RTO standards. These standards provide some guidance on pathways practice but do not refer to the Pathways Policy directly and regulators do not audit or consider provider compliance with the policy.

Other factors that drive pathways practice are:

- serving a diverse student cohort (to increase student numbers)
- responding to industry needs
- enhancing (or in some cases preserving) the institution's reputation
- providers' assessment of the costs and benefits of implementing credit pathways.[79]

AQF users value aspects of the Pathways Policy

Although it is not the main driver of pathways practice, respondents to Ithaca Group's research thought that the Pathways Policy "was valuable for expressing agreed national principles that are relevant across jurisdictions and education sectors."[80] Some people outlined other benefits including:

- encouraging RPL
- providing a 'platform for negotiation' and a reference point for establishing credit and articulation arrangements
- providing a basis for ways of controlling provider practices that grant credit inappropriately.

The 'platform for negotiation' refers mainly to clause 2.1.10 of the Pathways Policy, which lists percentages for credit that providers should award when students transition from a Diploma, Advanced Diploma or Associate Degree to a Bachelor degree in a related area. This clause is the most used section of the policy and Ithaca Group's work found that many stakeholders find it valuable.

---

[79] Ithaca Group, Credit Pathways in VET and Higher Education, 2018, pp. 5-6
[80] Ithaca Group, Credit Pathways in VET and Higher Education, 2018, p. 61

Despite this, it was criticised by some people for putting too much focus on one-way movement in the AQF. However, providers surveyed by Ithaca Group were unable to state what other pathways were suitable to include in clause 2.1.10.[81]

Possible ways forward for Pathways Policy

A threshold issue for the Review is whether the AQF should continue to have a policy regarding pathways and credit, when it is also addressed in some aspects of sector provider standards and regulation.

Stakeholders have told Ithaca Group that the multiple levels of focus in the policy seem confused, but also that they value aspects of both the high level and detailed clauses. It is therefore not clear what aspects of the policy require change. A minority of stakeholders felt that including more specific advice on credit pathways would be valuable.

An important issue identified in Ithaca Group's report is that higher education providers give credit mostly for formal learning. They may only give unspecified credit for non-formal and informal learning due to the difficulty of comparing it with specific learning outcomes. As the need for lifelong learning increases, it will become more important to recognise all forms of prior learning. The AQF previously contained National Principles and Operational Guidelines for RPL, but these were removed when the Pathways Policy was introduced. An updated form of such guidance that takes account of the changing nature of work and learning could be reintroduced.

A shared credit transfer register could help students make better pathway decisions

The AQF Qualifications Register Policy states that organisations that issue qualifications will maintain public registers of their credit transfer and articulation agreements linked to the AQF Register, which was never established. Ithaca Group's study found that despite most higher education providers giving students information on credit during enrolment, most learners are unaware of what credit they may be entitled to and how they could apply for it. A Register of AQF qualification pathways could help with this issue. Similar to the current NSW TAFE credit transfer website,[82] a pathways register could list credit transfer agreements, and even credit decision precedents. This would provide more certainty and transparency to students about the potential outcome of a request for credit.

Possible approaches

- Revise the Pathways Policy as guidance, noting that primary responsibility for providing pathways sits with providers, training package developers and regulators.

- Develop a shared credit transfer register.

---

[81] Ithaca Group, Credit Pathways in VET and Higher Education, 2018, pp. 42-43
[82] NSW TAFE, Credit Transfer

AQF Qualifications Issuance Policy

The AQF Qualifications Issuance Policy sets out requirements for issuing a testamur and record of results for graduates. All these requirements are stated in the RTO Standards and the HESF.[83][84] Because these regulations are in place, the Issuance Policy may no longer be required, unless there is value in it setting out a single approach to issuance across the tertiary sector.

If micro-credentials are included in the AQF, the Issuance Policy, the RTO standards and the HESF may need to provide for digital badging.

AQF Qualifications Register Policy

The registers referred to in the AQF Qualifications Register Policy were never established. They were proposed to provide information about qualifications and accrediting authorities. The policy states that the intended information is provided by the TEQSA National Register, training.gov.au and state and territory registers of SSCE qualifications. Therefore, the Register Policy is not required.

AQF Qualification Type Addition and Removal Policy

The purpose of the AQF Qualification Type Addition and Removal Policy is to set out criteria for deciding if a qualification type should be included in the AQF. There is an ongoing need for this policy. Its criteria can be used to decide whether shorter form credentials should be included in the AQF. The policy will need to be administered, which the Review will consider when recommending future governance arrangements for the AQF.

Possible approaches

- Remove the AQF Qualifications Register Policy from the AQF.

- Retain the AQF Qualification Type Addition and Removal Policy in the AQF.

- Consider whether the AQF Qualifications Issuance Policy should be retained in the AQF.

5.2 Principles and Processes for the Alignment of the AQF with International Qualifications Frameworks

The principles for referencing other qualifications frameworks states requirements that must be met prior to an international alignment between qualifications frameworks. Since the initial development of the principles, the concept of alignment has been used interchangeably in practice with the concept of referencing or comparative analysis. The Department of Education and Training has conducted a number of referencing projects in recent years. It supports making the principles and processes for alignment with international qualifications frameworks a departmental policy to provide the necessary flexibility to engage in future projects of high strategic value to Australia.

---

[83] Commonwealth of Australia, Higher Education Standards Framework, 2015
[84] Commonwealth of Australia, Standards for Registered Training Organisations, 2015

5.3 AQF Explanations

The AQF includes a number of written explanations on:

- credit (articulation, credit transfer, and RPL)
- the honours degree
- documentation
- clustered qualifications
- disciplines
- graduates
- proportion of components of a qualification at a level
- research
- volume of learning.

It may be more effective and transparent to include the information provided by the explanations in the relevant policies or other parts of the AQF. Alternatively, it may be of benefit to incorporate them in relevant guidelines published by ASQA, TEQSA or other regulators.

Glossary

Unless the source is identified, the definitions in this glossary are for the purpose of this discussion paper.

Term	Definition
Application of skills and knowledge	Refers to how a graduate applies knowledge and skills in context and in terms of autonomy, responsibility and accountability (AQF Glossary of Terminology).
Competency-based training	A person is trained to meet the performance and knowledge in a range of different situations and environments, to an industry standard that is expected in the workplace.
Credential	Documentary evidence of an individual's qualification or competence in a particular educational, academic or occupational field.
Credentialing system	The means by which an individual's educational, academic or occupational qualifications are acknowledged.
Credit	The value assigned for the recognition of equivalence in content and learning outcomes between different types of learning and/or qualifications. Credit reduces the amount of learning required to achieve a qualification and may be through credit transfer, articulation, recognition of prior learning or advanced standing (AQF Glossary of Terminology).
Credit arrangements	Formal negotiated arrangements within and between issuing organisations or accrediting authorities and are about student entitlement to credit. They may also be formal arrangements made between issuing organisations and students (AQF Glossary of Terminology).
Credit transfer	A process that provides students with agreed and consistent credit outcomes for components of a qualification based on identified equivalence in content and learning outcomes between matched qualifications (AQF Glossary of Terminology).
Descriptor	Terms that describe the learning outcomes and other features of either qualification levels or types.
Digital badging	The recognition of learnings through a digital awards system.

Enterprise and Social Skills	Qualities such as perception, creative intelligence, social intelligence, problem solving, resilience, communication skills, digital literacy, teamwork, presentation skills, critical thinking, creativity, financial literacy, communication, collaboration, problem-solving abilities, conscientiousness, civic consideration, global awareness, durability, grit and perseverance that are also sometimes known as 'future skills'.
Formal learning	The learning that takes place through a structured program of learning that leads to the full or partial achievement of an officially accredited qualification (AQF Glossary of Terminology).
Knowledge	Knowledge refers to what a graduate knows and understands and it can be described in terms of depth, breadth, kinds of knowledge and complexity.
Informal learning	The learning gained through work, social, family, hobby or leisure activities and experiences. Unlike formal or non-formal learning, informal learning is not organised or externally structured in terms of objectives, time or learning support (AQF Glossary of Terminology).
Lifelong learning	The term used to describe any learning activities that are undertaken throughout life to acquire knowledge, skills and the application of knowledge and skills within personal, civic, social and/or employment-related contexts (AQF Glossary of Terminology).
Micro-credentials	A modular certification in a specific topic area of learning. A micro-credential may be granted in response to a demonstration of existing skills or upon completion of an assessed form of learning.
Nationally Recognised Training	Programs of training leading to vocational qualifications and credentials that are recognised across Australia delivered by registered training organisations (RTOs) (definition by NCVER).
Pathways	Allow students to move through qualification levels with full or partial recognition for the qualifications and/or learning outcomes they already have. (AQF Glossary of Terminology).
Provider	An institution that delivers secondary, vocational and/or higher education.
Qualification	A formal certification, issued by a relevant approved body, to recognise that a person has achieved learning outcomes or competencies relevant to identified individual, professional, industry or community needs.

Qualification type	Refers to the broad discipline-free nomenclature used in the AQF to describe each category of AQF qualification (AQF Glossary of Terminology).
Recognition of prior learning (RPL)	An assessment process that involves assessment of an individual's relevant prior learning (including formal, informal and non-formal learning) to determine the credit outcomes of an individual application for credit (AQF Glossary of Terminology).
Registered Training Organisation (RTO)	A training provider registered by ASQA (or, in some cases, a state regulator) to deliver vocational education and training services.
Self-accrediting provider	A higher education provider that has been given responsibility to accredit its own qualifications (Adapted from: AQF Glossary of Terminology).
Senior secondary certificate of education	The certificate that is available to be awarded on completion of senior secondary education (typically Year 12).
Skills	Refers to what a graduate can do. They can be described in terms of kinds and complexity and include cognitive, technical, communication, creative, interpersonal and generic skills among others (AQF Glossary of Terminology).
Skill set	A single unit of competency or a combination of units of competency from a training package that is linked to a licensing or regulatory requirement, or a defined industry need (Standards for Registered Training Organisations (RTOs) 2015).
Statement of attainment	Recognises that one or more accredited units has been achieved. (AQF Glossary of Terminology).
Taxonomy	A taxonomy refers to the system of classification of learning outcomes in a qualifications framework (AQF Glossary of Terminology).
Tertiary education	Vocational education and training (VET) and higher education.
Training package	The components of a training package endorsed by the Industry and Skills Council or its delegate in accordance with the Standards for Training Packages. The endorsed components of a Training Package are: units of competency; assessment requirements (associated with each unit of competency); qualifications; and credit arrangements. The endorsed components form part of the requirements that an RTO must meet under these Standards. A training package also consists of a non-endorsed, quality

assured companion volume/s, which contains industry advice to RTOs on different aspects of implementation. (Standards for Registered Training Organisations (RTOs) 2015).

Unspecified credit	Credit granted towards elective components of a qualification or program of learning (AQF Glossary of Terminology).
Volume of learning	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 (AQF Glossary of Terminology).

Note: The Review welcomes the observations on the definitions in the glossary.

Appendix A: Terms of Reference

Background

The Australian Qualifications Framework (AQF) was introduced in 1995. It provided criteria for defining qualifications based on educational characteristics and outcomes for each qualification. The main AQF goals were to provide nationally consistent recognition of qualifications and facilitate student mobility between education sectors and the labour market.

Following a two-year review, a revised AQF was released in 2011, with a second edition released in 2013. It introduced the current ten level structure and aligned the AQF more closely with international practice. The revised AQF focused on descriptors for knowledge, skills and their application in increasing complexity over the ten levels of qualifications, complemented by volume of learning descriptors. It also introduced new and revised supporting policies.

The AQF remains an integral part of Australia's framework for quality assurance in education and training and is a key feature of Australia's international education standing. Since it was last revised, there have been innovations in qualifications frameworks internationally, as well as changes in the nature of work that affect Australia's skills requirements. There have also been changes in education and training practice and relevant regulatory structures.

In light of these developments, the Australian Government will appoint an expert panel to review the AQF.

Terms of Reference

Taking into account developments in school, vocational and higher education, the nature of work, qualifications frameworks internationally, and the views of international and domestic stakeholders, the AQF Review Panel will:

1. Review the AQF structure and components (levels, qualifications and relevant explanations) and associated guidelines to ensure that they:

    i.   position the AQF for the future as a flexible and responsive instrument that guides the provision of consistent high quality and transparency in the Australian education system;

    ii. reflect the knowledge, skills and capabilities required by individuals for effective economic and social participation and which meet the current and anticipated skills needs of the Australian economy;

    iii. effectively facilitate access to learning pathways and mobility (for example through articulation arrangements, credit transfer and recognition of prior learning) within and between education sectors, AQF levels and AQF qualifications;

    iv. reflect international good practice.

2. Review the desirability and feasibility of developing a system for the quality assurance and incorporation within the AQF of non-AQF credentials such as skill sets, enabling and foundation courses, micro-credentials and in-service and advanced training provided by industry or professions and other non-AQF credentials.

3. Provide specific advice on:

    i.   the relationships between levels and qualifications to ensure that they are clear, appropriate and unambiguous, taking into account their use in different education sectors;

    ii.   whether the descriptors are expressed in simple language that supports ready and consistent interpretation and application;

    iii.   volume of learning, including whether:

        a)   it should be a time-based measure and, if so, whether it should be aligned with other time-based measures employed in vocational education and training sector specifications and requirements;

        b)   it should be replaced by a credit point system;

        c)   the disparities in volume of learning between qualifications at the same level can be supported by additional information such as prerequisite learning; and

        d)   it is a necessary descriptor in the AQF;

    iv.   the placement of vocational education and training (VET) and higher education (HE) qualifications in the AQF and consider:

        a)   any areas of convergence and optimal points of differentiation of VET and HE qualifications in general and specifically at levels 5, 6 and 8;

        b)   the extent to which the AQF currently implies a status hierarchy from VET to HE qualifications and whether this can be mitigated through changes to the structure or language of the AQF;

        c)   means by which the AQF can assist with greater consistency in regulation of AQF compliance between HE and VET;

    v.   whether and how the AQF should incorporate guidance for people wishing to build a qualification from a variety of courses and/or providers.

4. Provide advice on changes to AQF policies[85] that would be required to give effect to the outcomes of the Panel's advice on the Terms of Reference 1-3 and other desirable changes. Consider whether any of these policies that deal with domestic matters should be situated within Tertiary Education Quality and Standards Agency and VET regulator registration and accreditation guidelines.

5. 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 to ensure ongoing currency of the AQF through monitoring and review.

6. The Panel will provide an initial report including recommendations on consequential changes to the AQF on the matters outlined above and, subsequent to consideration of that report, develop an implementation plan required for implementation of the changes.

---

[85] Including issuance policy, pathways policy, register policy, addition or removal policy, and principles and processes for alignment with international qualifications frameworks and relevant explanations.

In order to address the Terms of Reference the AQF Review Panel will:

- advise the Secretariat how the AQF Review should be considered and approached
- advise which stakeholders should be consulted and what sources of data and research should be considered
- meet with key stakeholders and possibly hold public forums
- advise on and approve both the public discussion paper and the final report
- in addition to consulting with stakeholders, meet as required (once every two months, maximum once a month.