



INDEPENDENT
HIGHER EDUCATION
AUSTRALIA

SUBMISSION TO THE AUSTRALIAN QUALIFICATIONS FRAMEWORK

15 March 2019



Review of the Australian Qualifications Framework

Discussion Paper

DECEMBER 2018

The Australian Qualifications Framework (AQF) Review 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 its 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, but invites differing analysis, conclusions and proposals.

To make a submission to the Review, please email this form to AQFReview@education.gov.au by **15 March 2019**.

Please note that the Australian Government Department of Education and Training will not treat a submission as confidential unless requested that the whole submission, or part of the submission, be treated as such.

Please limit your response to no more than 3000 words.

Respondent name

Dr Sally Burt

Respondent organisation (where relevant)

Independent Higher Education Australia (formerly COPHE)

IHEA represents the majority of Australia's registered and accredited independent higher education providers (including independent universities) with campuses across Australia. IHEA members educate students in a range of disciplines including Law, Engineering, Agricultural Science, Architecture, Business, Accounting, Tourism and Hospitality, Education, Health Sciences, Theology, Creative Arts, Information Technology and Social Sciences. IHEA members are higher education institutions with both for-profit and not-for-profit business models and they educate domestic and international students in undergraduate and postgraduate programs.

The Australian independent higher education sector comprises more than 130,000 students and 120 institutions, with independent providers variously accredited to offer courses across the full AQF range (diplomas up to doctorates).

IHEA holds a unique position within the higher education sector as a representative peak body of higher education providers only. Whilst some members are dual sector, only the registered higher education entity affiliates through IHEA membership.

Membership of IHEA is only open to providers that are registered with the Australian regulator – Tertiary Education Quality Standards Authority (TEQSA). Membership is also conditional on continued compliance with IHEA's Code of Good Practice.

IHEA's primary goal is promoting equity, choice and diversity for all Australian higher education students.

1. In what ways is the AQF fit, or not fit, for purpose?

IHEA members welcome the review of the AQF. There are several key issues with the functioning of the current AQF, the impact of which is greater for independent providers than for self-accrediting institutions. Non-self-accrediting institutions are dependent on their relationship with the regulator and on having a clear understanding of the framework for decision-making that TEQSA uses in order to operate effectively in the higher education sector. At present that understanding is not adequate.

IHEA submits that there are several key areas in which the current AQF is not fit for purpose. Reform is needed for it to assist the operation of the education system in the current regulatory environment and to address the challenges posed by the rapid advancements occurring in the education sector.

- The current AQF is not clear enough about how TEQSA is to use it for regulation of providers. There needs to be clarification about the legal status of the AQF and about how TEQSA, as the regulator, should use it.
- The current AQF also has an outdated measure for volumes of learning. Using years as the measure does not meet the standards of modern pedagogical approaches that are increasingly flexible and self-paced meaning that there are varied timeframes for completion.
- Currently, the AQF does not recognise micro-credentials and short courses as part of qualifications and so their value is diminished, despite them becoming increasingly important to skills development and adaptability to meet the needs of the future workforce. Providers and students would be better served by having them recognised by the AQF. Self-accrediting providers are able to provide this recognition but non-self-accrediting independent providers need better guidance on a framework for standardising and facilitating this recognition.
- The pathways policy in the current AQF is not fit for purpose and few providers use it in their RPL or credit transfer arrangements.
- There is too much ambiguity caused by the overlap in regulation between ASQA and TEQSA at the mid-level qualification levels including Diplomas, Advanced Diplomas, Graduate Certificates and Graduate Diploma qualifications that are delivered in VET and higher education.
- The AQF has duplication of elements within the level and qualification descriptors that should be removed so the AQF is clearer.
- The language of the AQF document is too complex and does not speak to a general audience. If the AQF's purpose is to be used by the general public to seek to understand their educational aspirations and options, this is not fit for purpose.

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

The Relationship between the AQF and the Regulator

The most urgent priority for reform of the AQF is the need to clarify the relationship between TEQSA and the AQF. Currently, it is unclear exactly how TEQSA should use the AQF to regulate providers. A reformed AQF should clarify its status in terms of the regulatory framework of the sector. It would be simpler and more effective for providers if they were able to understand whether the AQF was meant to be used as a prescriptive document or as a guide. IHEA advocates for TEQSA using the document as a guide and that the AQF document state that explicitly. Some elements of the AQF are already regulated under the TEQSA Act 2011 and the HESF 2015, such as course design, which is covered in Part 3.1 of the HESF and Learning Outcomes and Assessment which is covered by Part 1.4 of the HESF. This kind of duplication should be rectified so that the tool to be used by the regulator to uphold Standards in these areas is clear.

Providers see the AQF as acting as more of a guide to the development of courses and units of study. Where there is a need for a more prescriptive regulatory approach, such as the learning outcomes that should be achieved at a certain level, the matter should be covered by the HESF. Another example of this is the granting of credit which TEQSA currently regulates through its own processes. The AQF offers a basis for negotiation of credit loadings for pathways in its Pathways Policy. As noted in Phillips KPA Contextual Research for the Review, this system has not been well utilised by the sector and TEQSA often uses these base loads suggested for negotiation as a limit. The AQF could provide a more standardised credit point system for courses that could be used as a guide to supplement TEQSA's current regulatory instruments to more effectively deal with credit transfers and RPL. The prescriptive elements of credit and RPL are addressed in Part 1.2 of the HESF and the aspects of credit points as a less rigid guide should be the domain of the AQF.

The AQF should be left as guidance for elements that cannot be clearly defined or for which it is inappropriate to form rigid measurements. Issues such as Volume of Learning need to be considered as guides because too many variables can alter the appropriateness of the Volume of Learning required and indeed which activities are measured within the Volume of Learning are contestable. These issues, therefore, are unable to be given clear prescriptive value in the regulator's legislative instruments and so they should remain the domain of the AQF, which should be considered a guide for the regulator. TEQSA's use of the AQF as a guide should then be clarified and explicitly stated within the AQF document.

Volume of Learning Measures and Regulation

Volume of Learning measures is the next priority area for reform. At present the Volume of Learning for courses are being measured in years. As more flexible modes of delivery are developed and technological innovation influences pedagogy and course delivery and less formal and structured learning patterns become more common, it is harder to measure the years a course has taken to complete. More providers are using and transitioning to a trimester model of teaching years and so this, again, will make the learning year different for different providers.

At present the year of learning is given a nominal value of hours (1200) anyway. It would be more appropriate for the measure to be learning hours and not years. Hours can be used to better reflect the more flexible completion of courses and are more relevant to the modern learning environment. It also allows for the differences between institutions operating on different periods of study years.

IHEA acknowledges that any unit used to measure learning is problematic because it is very difficult to measure learning as opposed to achievement of outcomes measured through assessment. This suggests that the Volume of Learning should be a measure of delivery along with sufficient learning time to accompany that, but the focus should always

be on the outcomes and measuring those. The Volume of Learning should be a secondary measure that the qualification is set at the right level and not a rigid restriction for course completion.

The hours of learning could also be linked to a credit point system that could also provide the framework for the recognition of completed micro-credentials and also lead to a more formal and standardised system of RPL and credit transfers. This credit point system would provide an underpinning of the AQF and the connection between different elements of it.

The difficulty in developing an appropriate measure, based on the inherent problem of quantifying what is being measured, is an indication of the status that should be applied to this element of the AQF. Using Volume of Learning as anything other than a guide creates a situation where providers cannot be flexible and responsive to individual learners' needs. There is, of course, a need to ensure that an appropriate amount of teaching has been offered and the student has had sufficient focused time to achieve the learning outcomes, but making this measure too rigid also poses problems.

The Volume of Learning issue demonstrates another area where being a non-self-accrediting provider presents a real disadvantage for operating in the sector. Self-accrediting institutions are more easily able to allocate a Volume of Learning and face less scrutiny of that decision than a non-self-accrediting provider. The Volume of Learning needs to be considered a guide and this needs to be consistently reflected in the regulator's practice.

Despite the point made in the discussion paper that the AQF currently allows the Volume of Learning measure to act as a "reference point" for TEQSA's regulatory decisions, that is not the experience of many providers. IHEA, then, also supports the Panel's proposal that the Volume of Learning should be judged by the needs of a "new learner" to allow for the justification of the provision of a qualification in a shorter timeframe to certain student cohorts. IHEA also encourages the AQF to be written in a clearer way to make the relationship between the regulator and different elements of the AQF transparent and explicit.

Recognition of Micro-Credentials to Complement Qualifications

The next priority for IHEA in terms of reforming the AQF would be to allow for some form of recognition of micro-credentials and shorter courses. IHEA supports the approaches suggested in the discussion paper that would allow for grouping of micro-credentials and the application of credit to existing AQF levels from them. The development of a credit point system that could be used to assign points to micro-credential courses could then be used for purposes of comparison and benchmarking. These credit points could then be used to gain credit towards a recognised qualification from a series of completed micro-credentials. This would, of course, need to be monitored for quality assurance of the micro-credentials and they would need to involve achievement of learning outcomes and the completion of a legitimate assessment regime for the short course to qualify for inclusion in the credit point system.

IHEA suggests the criteria for qualification for the credit point system should also include, the quality of delivery and instructor, learning outcomes achieved and alignment to elements within the AQF. There would also need to be careful monitoring of the groupings or sequencing of related micro-credentials to ensure a relevant qualification was obtained. IHEA also suggests that before the micro-credentials grouped together to provide credit towards a qualification could indeed be used for this, an institution (the awarding institution) would need to ensure the student were assessed properly against the criteria for the award of the qualification sought.

Providers and students would benefit from the ability to formally recognise short courses and micro-credentials.

Allowing micro-credentials to have a more useful role in the cache of higher education delivery options would create a stimulus for innovation and greater adaptability of course and learning design. As the Alphabeta report “Future Skills” suggests, these types of shorter courses will account for a greater portion of people’s life-long learning into the future. Although it has also been suggested that many learners would undertake these courses regardless of whether there is formal certification or not, it would benefit these learners, the economy and the whole higher education system if the AQF were to be adapted to take account of these courses. For the AQF to be a resilient document that addresses the needs of the sector, employers and society for the future, there needs to be a mechanism by which micro-credentials can be formally recognised.

A system for recognising micro-credentials would also assist in the measurement of attrition and retention. Students who do not complete full qualifications count towards attrition statistics even though they may never have intended to complete the full qualification when they commenced their study. Allowing providers the flexibility to offer partial qualifications with some formal recognition of that partial study would assist in a more accurate measurement of actual attrition from their institutions.

The standardised credit points system could also be applied to qualifications in the AQF to better map them to courses internationally. Using the more recognisable credit system to describe and assign “value” to Australian qualifications would allow better market signals of the comparability of courses on an international basis. This would make Australia’s higher education system more competitive internationally.

Using higher education students’ assigned Universal Student Identifier, credit points accrued through different courses of study could be recorded for a student in a database that was retained indefinitely. Although some limits around the duration of the credit points holding against a qualification would need to be instituted to ensure currency of the qualification, it would be useful for the promotion and efficiency of the concept of life-long learning. It would also allow the adaptability of a student’s skills over time to respond to the changing employment market.

Standardised RPL and Credit Transfers

The next area of priority for reform of the AQF for IHEA’s members is the need for a more formal and standardised system of RPL. As examined in the “Credit Pathways in VET and Higher Education Research Project Final Report” by the Ithaca Group (2018), the Pathways Policy that is part of the current AQF is not well utilised by the sector. There is inconsistency in the approach of different providers and institutions to RPL and credit transfer arrangements. Students then face uncertainty about the possible future pathways leading from a qualification. This is not good for the reputation of the system or for students.

A more standardised system of RPL and credit transfer, though, would benefit independent providers that can deliver in more specialised areas of study and therefore can be well-placed to provide specialised recognised short courses or micro-credentials. Students would benefit from an improved credit transfer system that allowed more transportability of their study.

If the AQF were underpinned by a credit point system it would be useful from the perspective of creating a more consistent approach towards RPL and credit transfer arrangements. There would be a standardised currency for providers to use to make a judgement about the credit arrangements and students would have a guide to the credit they might be entitled to and would have an objective measure to use to advocate for RPL and credit transfers.

Changes to Levels and Taxonomy

IHEA sees reform of the levels system as another priority. IHEA would like to see the

approach outlined in the Panel's discussion paper of using AQF level descriptors **only** to describe knowledge, skills and application of knowledge and skill. The qualification type descriptors could then outline the qualifications linked to that level. This would reduce the duplication in the AQF and make it less confusing for users. IHEA supports the revision and examination of other elements of the taxonomy and levels descriptors to remove other areas of ambiguity and duplication to give the AQF greater clarity and simplicity.

IHEA also supports greater clarification between the qualification types that are duplicated in VET and higher education, i.e. the Diploma (level 5), Advanced Diploma (level 6), Graduate Certificate and Graduate Diploma (level 8). Revision of these qualification types to clarify the pathways and credit arrangements between the VET and HE qualifications, and to ensure they are clearly articulated and facilitated, not hindered. The use of the credit points system across the AQF may assist in this clarification. The differences in the regulation by ASQA and TEQSA of these qualifications, particularly in terms of the difference in learning outcomes and the qualifications necessary for teaching staff, is crucial to resolve issues resulting from the current AQF in these areas.

A suggested improvement for the AQF would also be to reframe the levels into broader classifications such as AQF levels 5-6 being classified as "Foundational", levels 7-8 "Synthesis", levels 8-9 "Mastery" and level 10 "Expert". This could mean that the qualifications were separated by sector within a broader levels framework.

3. 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.

- The changes recommended by the Panel should be made with reference to ensuring that the relationship between the AQF and its regulation is very clear. The regulator needs a clear understanding of how to interpret the AQF and its features so it can deal most appropriately with providers to ensure the protection of the high standards of qualifications they award.
- Another implementation issue that needs to be considered is that no damage is done to the existing qualifications people have been awarded. Any changes to the nature of qualification need to be made in the context of protecting the reputation of qualifications awarded in the past so that people who currently possess those qualifications are not penalized by any changes that are made.
- It is also important that the implementation of any reforms to the AQF does not endanger any self-accrediting authority that providers currently possess. Self-accrediting authority is a hard-earned achievement and so changes to the AQF need to avoid any threat to the possession of existing self-accrediting authority or weakening of it.
- Lastly, if changes are made to the Volume of Learning required for different courses, account needs to be taken of the status of visa holders studying in Australia. If visa restrictions/allowances for study time are measured in a different measure to the Volumes of Learning outlined in the AQF some mismatch and confusion may occur. This should be considered and rectified in the implementation of any changes made to the AQF.

Other

- IHEA would also like to advocate for the use of plain language in the AQF document. For the AQF to be a more broadly utilised framework it needs to be read and understood by a broader audience than higher education providers and experts. To assist in that clarity around the elements included in the AQF is important and so the language used needs to be plain and simple.
- IHEA would also like to comment briefly on the governance of the AQF moving forward. The Panel has made clear that this will be considered in due course when the form of the AQF has been arrived at. IHEA would still like to take this opportunity to advocate for governance arrangements that allow stakeholders to communicate with the governance body directly and to ensure the AQF remains relevant, responsive to the sector's needs and continues to reflect best practice. To do this there needs to be a standing body responsible for its governance.