



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

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Respondent organisation (where relevant)

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

Before considering in what ways the AQF is fit (or not fit) for purpose it is helpful to reflect upon the main purpose of the AQF and whether these objectives are still up to date and reflected in the current consultation process.

Purpose:

While the AQF was initially established as a loose framework, over the years its structure has become more regulated and comprehensive. Its current key objectives, amongst others, relate to promoting diversity of educational offerings, supporting lifelong learning, achieving international alignment of the AQF, and supporting the mobility of graduates. The AQF is still as relevant as ever in providing broad transparency of what education providers are offering as well as what individuals are offering to the labour market following graduation. The rising popularity of shorter form credentials has however added

a new dimension to the discussion of lifelong learning. The current review of the AQF acknowledges this but also faces the broader challenge of being able to provide flexible and agile learning pathways, which are increasingly expected for individuals' continuing successful participation in the labour market. As such, a decision needs to be made whether it is appropriate to further expand the scope of the AQF and its regulatory power (to for example include shorter form credentials).

Ways the AQF is fit for purpose:

The AQF constitutes a valuable national framework that provides broad consistency of expected learning outcomes for a range of qualifications offered by education providers. The AQF offers guidance to providers on degree levels. It also constitutes a useful reference point for professional accreditation bodies.

Ways the AQF is not fit for purpose:

1. **Simplification.** There is capacity for further simplification, in particular with regards to developing a single set of descriptors for each level rather than for each qualification type.
2. **Confusion between level 7 and 8.** Please see below for further information.
3. **Inconsistent naming convention.** This applies particularly to the 'Diploma problem' we discuss below.

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.

Reforms should first and foremost focus on simplifying and streamlining the AQF to provide maximum transparency and clarity to all stakeholders. The value of the AQF lies in providing a broad architecture for qualifications rather than a more nuanced one and it would therefore be useful to focus on the distinctions among levels rather than among qualification types. The reform suggestions below reflect this priority.

1. **Clearer distinction between levels 7 and 8.** We also think it is worth revisiting whether the structure of the existing levels 7 and 8 is fit for purpose. We recognise that some national qualifications include the equivalent of level 8 (e.g. UK, NZ) whereas others do not (e.g. Europe). We see value in the simplicity of the European system and we note that the unpublished study conducted by the AQF Council prior to finalisation of the 2011 framework showed that key stakeholders were able to make clear distinctions among Bachelor, Masters and Doctoral degrees, but failed to distinguish clearly between awards at levels 7 and 8. Furthermore, as suggested below, if the AQF (or some broader guidelines) recognise awards as *leading to* a level rather than being *at* a level, we believe there is merit in reclassifying existing level 8 awards (Graduate Certificate, Graduate Diploma, Bachelor (Honours)) as at the same level as Bachelor degrees while also *leading to* (in the sense of offering credit towards) Masters level rather than as at level 8.

Alternatively, if there is a strong wish to retain level 8, we believe that at least the

smaller level 8 award (i.e. Graduate Certificate) should be reclassified as *leading to* level 8 rather than as *at* level 8.

2. **The 'Diploma problem'**. There are currently two quite distinct versions of an AQF level 5 Diploma: an award recognised as preceding a Bachelor degree and offering no credit towards it; and an award that might be wholly contained within a Bachelor degree and hence offer full credit towards it. We think these two should be distinguished in name and we therefore recommend re-introducing a diploma-like award (e.g. Baccalaureate Diploma?) leading to level 7. The value of this step would be to recognise the common need for a student to complete the equivalent of an undergraduate major. It would also resolve the longstanding confusion between a genuine level 5 Diploma and an undergraduate Bachelor sequence currently labelled a Diploma.

3. **A single set of specifications for each level, rather than for each qualification type.**

We agree with this simplification, but raise for the Review's consideration the importance of clarifying whether the distinctive expectations for the Masters Extended qualification type will be retained. Our view is that:

- a. the distinctive expectations are of value but could be clarified, perhaps to require: advanced coverage of methods of inquiry in the field; a research experience sufficient to prepare a graduate to contribute to research as a working professional in the field of the degree; an integrative capstone experience; and possibly also the option of a more substantial research project affording a pathway to doctoral level study in the field;
- b. the Issuance Policy can cover any distinctive requirements for use of Masters Extended nomenclature (JD, MD etc) if the descriptors for qualification types are removed from the AQF (as we believe they should be).

4. **Removal of AQF policies.** For the purpose of streamlining and simplicity we support removing as many AQF policies as possible.

5. **A common unit for the description of 'credit hours'**. We support this reform suggestion of the discussion paper as it aligns with the overarching objective of simplifying and streamlining AQF processes and classifications. We note, however, that the level descriptors should continue to take primacy in determining the level of a qualification and that 'volume' or 'credit hours' should be indicative only.

6. **Addressing the breadth versus depth dilemma.** The AQF was created as a hierarchy, distinguishing awards by the depth of required knowledge, skills and application of knowledge and skills. Nonetheless, there is an expectation of some breadth at each of the higher education levels since the requirement for application of knowledge and skills requires graduates to be able to understand the context in which their level of knowledge and skills is being applied. The intercalated two-part

structure for the AQF proposed below arguably resolves a longstanding concern that the AQF failed to reflect some important variations among awards in the breadth of knowledge, skills and application of skills. If the higher education awards at a level all have a requirement for at least some breadth (as implied by the current level specifications), then this tension is reduced.

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 most pertinent concern for all stakeholders is the funding implications arising from any proposed changes.

Funding implications. It will be very important to understand early how any changes to the AQF will change the funding environment for students, universities and government and other stakeholders.

Too early to incorporate shorter form credentials into the AQF. We see rapid change in the development and arrangements for shorter form credentials and our preference is not to rush to regulation, lest we fail to gain the full value of an innovative moment in time. We believe it is too early to incorporate these credentials into the AQF and are also concerned to ensure that we do not undermine the AQF through a poor conceptualization. We have nonetheless proposed a tentative approach below to incorporating shorter form credentials should this emerge as a preferred way forward.

Shorter form credentials and the meaning of 'level'. Should, despite our contrary recommendation, shorter form credentials be included in the AQF, it will be important to define what exactly it means for a shorter form credential to be allocated to a level and to distinguish it from the meaning of a substantial award being at that level (e.g. Bachelor, Master and Doctoral degrees). In particular, if shorter form credentials are to be included we support an intercalated level structure for two types of awards:

- a. *Accreditation at a level for major awards:* an allocation of major awards to AQF levels with level specifications characterising the meaning of accreditation at each level; and
- b. *Accreditation (or other recognition) of smaller awards and other shorter form credentials as leading to a level:* an allocation of smaller awards and other shorter form credentials as leading to (understood as offering potential credit towards) these levels, described further below.

We see it as implausible that a shorter form credential can *achieve* the full level specifications of a particular level unless students undertaking the shorter form credential are required to enter with a high level of mastery at that level. Rather, we think it is more feasible to allocate a shorter form credential as leading to a level *if it can be recognised as offering credit to a major award at that level*. Allocation of a short form credential to a level will probably entail

in many cases the assumption that students have achieved the learning outcomes of the prior level. In this way, smaller award courses and other shorter form credentials would serve as steps between the existing AQF levels. We also see potential value in reclassifying some existing qualification types (e.g. the Graduate Certificate) to this second type. For an illustration of what we propose, please see Figure 1 below (the right hand diagram reflects this recommendation; the left hand diagram also incorporates the additional suggestion above concerning the merging of levels 7 and 8).

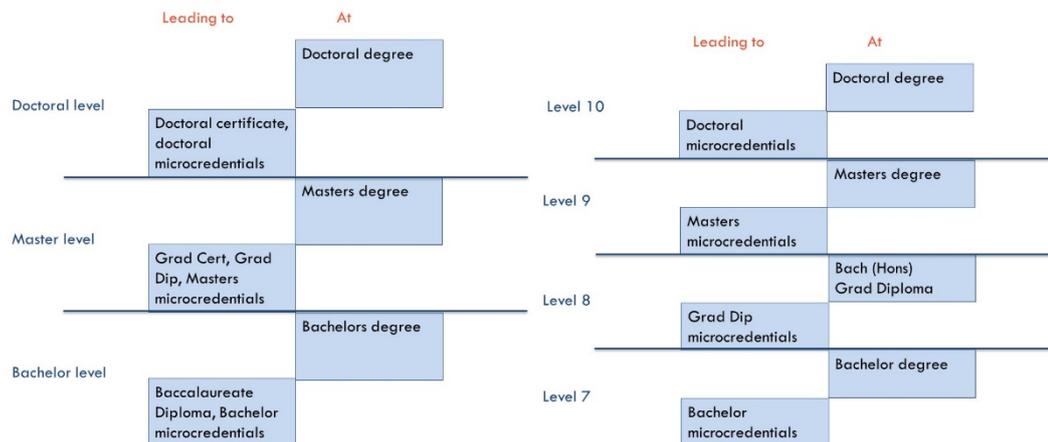


Figure 1. Proposed structure for AQF showing bachelor level and above only and some illustrative award and shorter form credentials. The version on the left reduces levels 7-10 to 3 levels (Bachelor, Master, Doctor); the version on the right retains levels 7-10.

Other

Reform suggestions that the University of Sydney does not support:

1. **A national credit transfer register.** We think the proposed structure of the AQF will provide clear signals about the level of recognition each awarding institution is giving to its own accredited award and shorter form credentials, and this is a more achievable initial step than an immediate decision to create a national credit transfer register.
2. **A body to allocate shorter form credentials to a level, as in New Zealand.** We do not support this reform suggestion as it stands in contrast to the self-accrediting nature of universities and higher education providers with self-accrediting status. Self-accrediting institutions can allocate awards and shorter form credentials to levels for themselves using their existing mechanisms and those without self-accrediting capability can apply for accreditation at a proposed level through TEQSA.

- 3. The role of generic, enterprise and social skills in the AQF.** We believe broader skills are of immense importance to graduates and we include them as learning outcomes within all of our degrees (e.g. in addition to mastery of primary field and discipline, the learning outcomes of all Bachelor degrees at the University of Sydney refer to: critical thinking; problem solving; digital literacy; inventiveness; cultural competence; interdisciplinary effectiveness; an integrated professional, personal and ethical identity; and influence). But we don't see the need for the AQF to separate these learning outcomes from more discipline-based outcomes, and we particularly advise against the adoption of any one particular list of skills or qualities because variation in emphasis across institutions is desirable as well as the ability to flexibly adapt to new requirements in response to social and economic needs.
- 4. The proposal to recognise some awards as at multiple levels.** While this is possible, it questions the value of characterising the award in the AQF, which must surely be the level achieved by all undertaking the award (i.e. if an award sits across levels 5-7, it is arguably a level 5 award). As such we do not see sufficient benefit of implementing this proposal.