



Australian
Qualifications *Framework*

AQF COUNCIL

STRENGTHENING THE AQF:
A PROPOSAL

Analysis of Submissions

September 2009

Executive Summary

The Australian Qualifications Framework Council was established in 2008 as a Committee of the Ministerial Council on Education Employment Training and Youth Affairs (MCEETYA)¹ with responsibility for advising ministers on the maintenance and strengthening of the Australian Qualifications Framework (AQF).

In May 2009, a consultation paper, *Strengthening the AQF: a Proposal* was drafted by the Council as a basis for strengthening the Australian Qualifications Framework.

The *Proposal* was developed in response to the need for improved linkages and connections between qualifications and sectors as identified by MCEETYA. It took into account the responses of the wide range of stakeholders who have participated in earlier consultations such as the Review of Australian Higher Education, the review of the AQF Advisory Board and the AQF Council's development of common terminology for credit arrangements.

The *Proposal* focused on ensuring that the objectives of the AQF are sound and creating a more contemporary architecture for the AQF comprising three integrated components:

- a taxonomy of learning outcomes to be applied to each qualification type
- referenced levels (of learning outcomes) structure in which each qualification type will be located, and
- measures of the volume of student learning for each qualification to aid further the linking of qualifications and support improved credit arrangements.

The AQF Council sought stakeholder responses to the *Proposal* which was disseminated widely. It was sent to stakeholder organisations identified in the Council's Communication and Engagement Plan with a request for it to be further disseminated. It was also publicised in the AQF e-newsletter and in the e-newsletters of stakeholder organisations and was placed on the AQF website.

In addition, key stakeholders were invited to meet with the consultation panel to discuss the *Proposal*. Most, but not all, accepted the invitation. The majority of people who attended the consultation meetings used the meeting as an opportunity to find out more about the *Proposal* and subsequently provided a written submission. Over 120 people attended these stakeholder meetings.

This report provides an analysis of the 84 submissions received from organisations and individuals to the *Proposal*. The responses represent the views of all AQF stakeholders and users.

A breakdown of the consultations and submissions that were received by stakeholder groups is provided in Tables 1 and 2 of this report.

Most stakeholders followed the format and sections of the *Proposal* to provide feedback and comment and these sections of the *Proposal* were used to provide the basis for the analysis.

¹ In July 2009, MCEETYA was replaced by the Ministerial Council for Tertiary Education and Employment (MCTEE)

There were many similarities in the comments received from stakeholders and there was no particular pattern of views on the various components of the *Proposal* by stakeholder type and education sector. For example many VET stakeholders suggested that ‘competences’ was not the most appropriate term for one of the taxonomy domains. This was also expressed in many of the higher education submissions.

There was a strong common desire from all stakeholders that the AQF should be strengthened in a way that did not diminish the respective roles of the various education sectors to provide learning opportunities for students.

Objectives

The submissions suggested that the current and proposed AQF objectives are basically sound but would benefit from some wording improvements to ensure that they are precise, realistic, attainable and measurable.

It was agreed that the robust national education and training goals that the AQF should support include:

- lifelong learning for effective participation in employment and the community
- recognition of all learning and experience however it has been achieved
- a standards based approach to ensure quality
- a seamless tertiary education sector in terms of student mobility but recognition that there distinct sub-sectors of tertiary education.

AQF Architecture

There was strong support for a revised AQF architecture, based on a taxonomy of learning outcomes with explicit reference levels that aims to improve understanding of the capabilities of individuals holding Australian qualifications and the connections between qualifications. There was agreement that the architecture must be:

- empirically defensible
- flexible and allow for provider mission diversity
- simple to understand
- easy to use and supplemented with guidelines to ensure that it is used appropriately avoiding incorrect assumptions being made, and
- compatible with international developments but based on the Australian context.

Taxonomy of learning outcomes and an explicit reference levels-based structure

The options included in the *Proposal* for the taxonomy of learning outcomes and the referenced based levels were considered to be useful. Many suggestions were made in the submissions regarding their further development and effective presentation. These are summarised in this report.

A measure of the volume of learning

The measure of volume of student learning by qualification type outlined in the *Proposal* resulted in the identification of some complex issues that are summarised in this report. The concept of a measure was attractive to the large majority of those who made submissions. However more detail was considered to be required, including how the measure relates to the learning outcomes focus of the *Proposal* to enable the merits of such a measure to be fully assessed.

Overall stakeholders supported the development of more detailed information regarding the revised AQF architecture for further consultation during the 'building the AQF architecture' phase.

The next section of this report provides details of the feedback for each section of the *Proposal*.

Analysis of submissions and consultations

1 Submissions and consultations

Eighty four (84) submissions were received in response to the consultation paper *Strengthening the AQF: a Proposal*. The respondents were from the full range of stakeholder groups of the AQF as shown in Table 1.

Table 1 Submissions received by stakeholder group and education sector

<i>Education sector</i>	<i>HE</i>	<i>VET</i>	<i>VET/HE sector</i>	<i>All sectors</i>	<i>School sector</i>	<i>TOTAL</i>
Stakeholder type						
<i>Providers including provider networks</i>	28	9	3			40
<i>Accrediting authorities</i>		5	4	3	2	14
<i>Industry bodies and employer groups</i>		9				9
<i>Professional Associations</i>			2			2
<i>Government agencies</i>	1	2	2		4	9
<i>Unions</i>		3	1			4
<i>Individuals</i>		5				5
<i>Research agency</i>		1				1
TOTAL	29	34	12	3	6	84

The consultation panel, comprising the Chair and staff of the AQF Council, met with 30 groups of stakeholders as summarised in Table 2, either face to face or via teleconference.

Table 2 Stakeholder groups involved in consultations

Stakeholder type	Number of responses
<i>Providers including provider networks</i>	8
<i>Accrediting authorities</i>	8
<i>Industry bodies and employer groups</i>	4
<i>Government agencies</i>	3
<i>Unions</i>	2
<i>Individuals (including researchers)</i>	3
Total	30 groups/over 120 individuals

At each meeting with stakeholder groups, participants were invited to provide comments, feedback and/or seek clarification on the *Proposal*. Only two stakeholder groups who met with the AQF panel did not provide further input through a written submission.

2 Submission analysis

Each of the submissions was examined and a summary prepared of all of the key points made. A standard summary template was used based on the format of the *Proposal* consultation paper that had the following five interrelated components:

- 1 Objectives of the AQF
- 2a A taxonomy of learning outcomes
- 2b Explicit reference levels
- 2c A measurement of the volume of learning in a qualification type
- 3 Other proposals to be developed as part of the next phase.

Any general comments that were made and/or extra information provided have been included in the sections below and will be taken into account in designing the next stages of the project.

2.1 AQF re-design principles

Many general comments were made in the submissions that outlined the desired principles for the AQF re-design. These included that:

- (a) the objectives of the AQF should be precise, realistic, attainable and measurable.
- (b) a revised AQF architecture should be:
 - based on a strong case for change and be empirically defensible
 - compatible with international developments but based on the Australian context
 - future oriented to have longevity
 - simple to understand and use, with complexity kept to the minimum required to achieve coherency
 - supported by strategies and/or guidelines to ensure its application is rigorous and as intended.
- (c) the AQF must be flexible but not:
 - inhibit innovation and provider mission diversity, nor
 - challenge the autonomous self accrediting status of providers, nor
 - ignore the close association between vocational education and training qualification types and industry needs and industrial arrangements.

2.2 Proposal 1: Strengthening the objectives of the AQF

The *Proposal* was that the objectives of the AQF are aligned with the policy goals which it is designed to underpin and support.

The specific question asked was:

- What changes should be made to the existing statement of objectives of the AQF to reflect national education and training goals?

A vast range of views were expressed regarding the objectives of the AQF. These views have been collated into various categories in Table 3 below.

Table 3 Submission responses regarding the objectives of the AQF

Response	Number
Existing objectives are OK	8
Existing plus proposed new objectives combined	6
New objectives as presented	11
New objectives modified	19
Other general points made on the objectives	20
Nil Response	20
Total	84

A few submissions considered that renewed AQF objectives and architecture should take into account and be compatible with other education and training policy initiatives that are underway in parallel with the *Strengthening the AQF* project.

These policy initiatives include the:

- COAG Human Capital Reform Participation and Productivity Agenda
- Australian Government: *Review of Australian higher education*
- NQC / COAG *VET Products for the 21st century*
- Skills Australia *Foundations for the Future*
- AUQA *Academic standards system for higher education*
- Proposal for the introduction of Tertiary Education Quality Standards Agency (*TEQSA*).

Other submissions suggested that the objectives and architecture of the AQF should reflect robust education and training goals whose currency will survive political changes including:

- lifelong learning for effective participation in employment and the community
- recognition of all learning and experience however it has been achieved
- a standards based approach to ensure quality
- a unified tertiary education sector or a seamless tertiary education sector in terms of student mobility.

It was emphasised in many of the submissions from the vocational education and training sector that AQF qualifications should enable effective participation in the labour market and that this should be reflected in any new AQF objectives.

Suggested changes to the objectives of the AQF

The current AQF objectives were preferred by a few respondents who suggested that there is no imperative to change them except to make some wording improvements. Suggestions were made that the current third objective should be removed because it is confusing and appears to serve little purpose.

A set of points in the *Proposal* that highlighted areas of focus for the AQF were commented on by most of the submissions including suggestions on how these could be incorporated as objectives of the AQF.

Several submissions made more general observations about both the current and proposed new AQF objectives. It was observed that the objectives range and vary in their primacy and that they include a mix of primary objectives, that focus on the precise roles of the AQF, and secondary objectives, that are about what the AQF underpins or seeks to support and may be the province of others to achieve.

It was suggested that the primary objectives of the AQF should include to:

- set out the characteristics and requirements of each AQF qualification type
- demonstrate how the qualifications relate to each other, and
- be an authoritative reference for use by several groups and for several purposes.

It was suggested that the secondary objectives of the AQF are the uses and outcomes that the AQF seeks to support or influence including to:

- enable everyone to understand the expectations of the capabilities of individuals holding different Australian educational qualifications
- assist students to be clear about the full suite of work/study options available and to move more easily between different qualifications and education and training sectors and have credit awarded for their previous learning
- assist providers to make assessments of entry standards and learning requirements of entrants from multiple pathways *and* to establish pathways and credit arrangements based on a mutual understanding of the equivalence of qualifications
- provide accrediting bodies with an authoritative reference for educational quality assurance arrangements.

2.3 Proposal 2 Strengthening the architecture of the AQF

2.3.1 A taxonomy of learning outcomes

The *Proposal* was that a learning outcomes classification or taxonomy is developed as the basis for the qualification type descriptors in the AQF.

The specific questions asked were:

- Should an explicit taxonomy be used consistently to describe all qualifications?
- Which of two provided taxonomy options would better serve students and employer?
 - Option A: a three dimensional taxonomy of Knowledge, Skills and Competence (context and generic) or
 - Option B: a four dimensional taxonomy of Knowledge, Skills, Competence - context and Competence - generic.

All of the submissions indicated general support for a more explicit taxonomy of learning outcomes for application to all qualifications. There was a mixture of views on the two taxonomy options presented in the *Proposal* that have been categorised in Table 4. The rationale for each are also summarised in the table. There was no pattern of views by stakeholder type.

Table 4 Submission responses on a taxonomy learning outcomes

Option	Number of responses	Rationale
Option A or B	4	Because both options include the same sub components and will achieve the same outcomes.
Option A	17	Because generic skills need to be integrated and demonstrated and evaluated in a context, they are best achieved when embedded and are not as readily transferable as some suggest. Context and generic competencies are two aspects of the same thing. This option is compatible with other international systems and is simpler than option B.

Option B	29	Because generic skills are important and different in that they are transferable, these skills need to be highlighted to provide them with status. This will encourage more specificity and explicit statements on them and draw out these skills for industry and students.
Other options suggested	13	Suggestions included: <ul style="list-style-type: none"> • The proposed components but with sub-categories added for each. • An option without generic skills because while levels for them seem plausible this collapses when concrete examples are considered • An option with generic skills in the skills category because they are skills and each component of the taxonomy should be discrete. Generic skills sometimes are domain specific, for example, problem solving • A more simple two part Knowledge and Skills classification.
No option favoured	14	Because it is premature to commit to either option. Both require further work and the 'competence' aspects in particular.
Nil Response	7	
Total	84	

Two general issues were raised.

- The use of the term 'competence' to describe contextual and generic capabilities within the proposed taxonomies was not favoured particularly by the vocational education and training sector. 'Competence' could be confused with 'competency' which has a distinct definition in vocational education and training sector as follows:

Competency is the consistent application of knowledge and skill to the standard of performance required in the workplace. It embodies the ability to transfer and apply skills and knowledge to new situations and environments. (NQC/ COAG VET Training Products for the 21st Century)

- How the taxonomy is presented was also a concern for some. Some vocational education and training stakeholders felt that it needed to be made clear that the various domains of the taxonomy are not separate but are integrated or linked as every qualification type includes a particular mix of knowledge and skills and other learning outcomes.

Numerically, there was a preference for Option B over Option A. Option B was favoured to highlight generic skills. Those who preferred Option A did so for pedagogical reasons; generic skills are embedded in task performance and so need to be explicit but embedded in teaching, learning and assessment. A few other submissions were happy with either option A or B because they include the same elements that are organised differently.

There were several submissions that suggested an alternative to either option A or B. Of the alternative taxonomy suggestions the three main ones were:

- Option C: a 2 dimensional taxonomy: Knowledge and Skills (including context and generic skills). This option was the most often suggested alternative, by some universities in particular, because it is simpler and each domain is clearly distinguishable and unambiguous.
- Option D: a 4 dimensional taxonomy: Knowledge, Specific skills, Generic skills and Context. This was argued for on the basis that 'context' domain learning outcomes are different in that they are not within the control of the learner. This option was suggested by many from the vocational education and training sector.

- Option E: a 3 dimensional taxonomy: Knowledge, Skills and Application (i.e. context excluding generic skills). This option excludes generic skills on the basis that defining discrete levels for these skills will be difficult and the same level of application of these skills does not apply to all in particular qualifications.

Overall the submissions highlighted the need to:

- ensure that each component of the taxonomy of learning outcomes is discrete
- avoid the use of the term competence to describe any one domain of the taxonomy
- re-consider generic skills and whether they should be part of the taxonomy, where they are best placed and what they cover. Some suggested additions were literacy and numeracy, cultural awareness, teamwork and leadership.

Further, two submissions suggested changing the name to the 'generic learning outcomes taxonomy' to reflect the fact that the learning outcomes expressed in the taxonomy are not specific to a particular qualification.

2.3.2 Explicit reference levels

The *Proposal* was that AQF qualification types are organised within the AQF by an explicit reference levels-based structure.

The specific questions asked were:

- How could explicit reference levels enhance Australian qualifications and their use?
- What number of explicit reference levels would best illustrate and encompass the increasing complexity of Australian qualifications? (Two options were provided as examples: an 8 plus 1 entry level structure and a 10 plus 1 structure.)
- What is the best process to use for locating each qualification in a levels-based structure?

Nearly all the submissions supported an explicit referenced levels-based structure. Two submissions that did not support such a structure preferred the current 11 'level' qualifications type approach.

According to the submissions, an explicit referenced levels-based structure could enhance Australian qualifications and their use in the following ways:

- achieve greater consistency and an explicit sense of the relative value of qualifications (some noting that there are some inconsistencies that the levels will challenge)
- provide a better basis for students and employers to understand expectations of each qualification type
- increase portability of learning accomplishments and improve management of articulation and credit transfer between institutions in the education sectors
- inform design, delivery, evaluation and improvement of qualifications within institutions
- clarify relationships between Australian qualifications and other international qualifications
- provide a logical basis for both rationalisation and innovation in qualifications provision within and across education sectors.

Issues raised included that:

- a level-based structure may imply linearity and hierarchy and that this needs to be avoided

- there is no natural progression between levels. Students do not need to start at the bottom; entry can occur at different levels. Students can undertake a higher level qualification followed by a lower level one or a lower level qualification followed by one at a level several times higher or several qualifications at the same level
- it is not always possible to move between particular qualifications and levels because of differences in emphasis between qualifications (e.g. between practical and theoretical) which means that some qualifications may not prepare students for other qualifications. The levels may include clusters of qualifications that are equal but different.

Overall, submissions indicated that the referenced levels-based structure will enhance the AQF if, in the presentation of the referenced levels-based structure, it can be made clear that:

- there are a number of entry points
- pathways may be vertical as well as horizontal, and
- not all qualifications articulate.

With regard to the precise nature of the explicit referenced levels-based structure, a range of opinions were expressed in the submissions as documented in Table 5. There was no discernible pattern of preference by stakeholder type.

Table 5 Submission results on Reference Levels Options

Option	Number
8 plus 1 enabling level	19
10 plus 1 enabling level	13
An alternative was provided	7
No preference	30
Existing approach	2
Nil response	13
Total	84

Of the two options included in the *Proposal* (Table 7 page 20) the eight plus one enabling level option was favoured over the 10 plus one option but over half of the submissions did not nominate either of these two options.

Several alternative options were suggested including:

- variations of the 8 and 10 levels options
- more than 10 levels that could maintain the existing number of levels by qualification type
- five broad levels on which two submissions provided details.

About one quarter of the submissions indicated no preference as to the number of levels and instead made general comments including that:

- any system of reference levels should maintain the purpose and integrity of each qualification type (and the distinctiveness of education sectors) and support flexible and varied pathways
- the least levels as possible or the absolute minimum required, on the assumption that fewer levels means less specificity and more flexibility for providers, and
- the number of levels should be that which can enable qualification types to be clearly differentiated and distinguished.

Several submissions also remarked that the enabling level is essential. One respondent suggested it could be named the 'preliminary' level as for some this level is an end in itself.

A few submissions remarked on the inclusion of the indicative main stages of education/employment for each level in the examples in Table 7 in the *Proposal* (in the left hand column). Some considered this useful as a guide whilst others considered that learning outcomes should be the only basis of the levels structure.

Suggestions and issues

Many suggestions, issues and questions for consideration were provided in response to the question regarding the location of qualification types in a levels-based structure. There was no common agreement between stakeholders regarding these issues, summarised below.

- Enabling levels should include literacy and numeracy, employability skills, Year 11 and Certificate 1
- The need to acknowledge that Year 10 may include Certificates I and II and that Years 11 and 12 students can access Certificates III and IV
- The location of pre-apprenticeships qualifications
- The location of senior secondary qualifications may be at various levels (eg Certificates I-III) and one submission provided a research analysis to support this suggestion
- Year 12 equivalents such as the VCAL, International Baccalaureate, and university schools programs need to be included.

Differences of opinion were expressed on:

- the vocational equivalent of the Senior Secondary Certificate of Education; some submissions suggest it is the Certificate III, others the Certificate II
- whether Certificate III is on the same level or at a lower level than Certificate IV
- whether Diploma is at same level as Advanced Diploma and Associate Degree
- inclusion of Trades Honours and Trades Masters qualifications
- higher education qualifications as being more diverse than the *Proposal* suggests and one submission provided their detailed framework
- the distinction between Masters Degrees undertaken by coursework and by research with different prerequisites and outcomes
- the distinction between Doctoral Degrees via coursework, research and professional practice
- the distinction between Postgraduate qualifications that represent more 'horizontal learning' involving new academic or vocational learning from those that offer further 'vertical learning' in the same education field
- the inclusion of 'anomalous' qualifications such as double degrees, 4 and 5 year Bachelor Degrees and emerging foundation degrees
- the location in a levels-based structure of the Bachelor Degree with Honours qualification.

The vast majority of the submissions called for widespread and rigorous consultations on the location of qualification types at particular levels.

Several submissions also suggested that a greater array of existing qualifications frameworks be examined beyond those from Europe that featured in the *Proposal*. Asia Pacific frameworks were singled out in several instances of particular importance because the bulk of Australia's overseas students come from this region.

2.3.3 A measurement of the volume of learning

The *Proposal* was that AQF qualifications are assigned a measure of the volume of learning based on the notional student learning time involved in achieving the qualification.

The questions asked were:

- Would a measurement of the volume of learning add value to AQF qualifications and support improved credit arrangements?
- What is the best process to use to determine the credit point value for each AQF qualification type?

Table 7 Submission results on a measure of the volume of learning

Comment	Number
Did not support proposal	10
Unlikely to add value	6
Cautiously favourable	37
Support the proposal	26
Nil response	5
Total	84

There was no pattern of views by stakeholder type.

Those not supporting the measure of the volume of learning stated that credit must be awarded on the basis of learning achievements rather than time spent.

Many who responded positively qualified it on the basis that the proposed time-based volume measure should not be considered in isolation from learning outcomes and that it would provide an additional tool for those undertaking credit transfer arrangements to augment and complement other measures of complexity.

Many submissions indicated that they would support having a uniform volume of learning measure if it was combined with measures that illustrate the level and complexity of the qualification type and that its intended use for entry purposes to qualifications was made clear.

There were mixed responses to using a measure of the volume of learning to improve credit transfer arrangements.

Submissions suggested that the experience with the Victorian Credit Matrix provides positive evidence. Other positive evidence provided was the European Credit Transfer and Accumulation System (ECTS) that was reported to be in use for establishing equivalence with international qualifications and is not onerous or difficult to use.

One of the submissions that said 'no' to a measure of the volume of learning noted that previous research did not indicate correlations between a measure of volume and credit and that there are other issues that hamper increased credit transfer. Other submissions contended that improved credit transfer and movement between qualifications can be more readily achieved by a clear and more consistent specification of learning outcomes and/or clearer course structures between vocational education and training and higher education than a prescriptive approach to learning volume. Another argument was that a volume of learning will not address many of the debates between higher education and vocational education and training providers regarding learning process differences and could act to undermine progress made on credit arrangements between the sectors.

Several submissions were of the view that any measure must be at the unit level and not the qualification level because credit transfer occurs at the unit/module level and therefore so must an AQF credit system.

It was widely acknowledged that there are current variations in volume of learning between qualifications at the same AQF level and some submissions provided concrete examples. Some respondents argued that the current variations in the volume of learning between qualifications at the same AQF level are credibility and quality issues and favoured measures to address these issues.

The fact that different students take different times to achieve the same learning outcomes was used as an argument against the measure of the volume of learning measure as it negates a competency based system. Also an unintended consequence could be micro-managing of student's individuality and creativity.

For the vocational education and training sector respondents a measure of the volume of learning was a real concern because of possible implications for industrial awards.

Costs of a credit system were raised as an issue. A view was raised that a credit framework will not reduce the effort required to assess and give credit even though it will assist in the determination. On the other hand, it was recognized that there is much work already done and processes in place for assigning credit point values. Values that build on work already in place in industry and the professions have a chance of achieving long-term acceptance.

Many submissions suggested using the Victorian Credit Matrix as it uses an internationally recognised credit standard as proposed of credit point =10 hours of average designed learning and has levels of complexity based on learning outcomes.

A further suggestion was to investigate the *University Mobility in Asia and the Pacific Association* approach that uses 60 credit points=1 FTE(Year) and is used across the Asia Pacific region already and aligns with the European Credit Transfer and Accumulation System and Standard for comparing study attainment and performance across European countries.

A few submissions supported the credit range approach adopted in Table 9 of the *Proposal* (page 23) but noted that there were some inconsistencies to be corrected.

The overwhelming view was that the assignment of credit points should be evidence based and transparent in their calculation. Involving industry and other stakeholders on expert advisory panels was the most often made suggestion for this process.

Submissions suggested that guidelines need to be developed for assigning credit points using either 1 credit point =10 hours or a full time equivalent year as the basic unit to which an agreed number of credits are assigned.

Overall the submission responses indicated that a revised and more detailed volume of learning proposal is required and extensive consultations carried out to assess fully its merits.

2.4 Next steps

The *Proposal* included a section on next components that will be built in the final redesigned AQF architecture. The next steps section identified the following:

- A credit system

- Cross-sectoral linkages and pathways improvement policies
- Protection of AQF qualifications mechanisms including through consistent documentation and use of qualification titles
- Register of qualifications and providers
- Addition and retirement of qualification types
- Quality assurance and governance of the AQF.

The majority of the submissions did not comment on this section of the *Proposal* although several submissions identified that they were in the process of undertaking work on credit rating systems. Some submissions indicated that they were favourable to a national register of qualifications and providers and others supported new mechanisms to protect AQF qualifications. Several submissions raised the issue of recognition of non-formal and informal and workplace learning being included in the AQF

2.5 Conclusion

A report of the consultation and submission feedback was provided to the AQF Council at its meeting in August 2009. As a result, the Council agreed that the consultation outcomes provided the basis for a more detailed work and consultation plan for the design and introduction of a stronger and more relevant Australian Qualifications Framework and to proceed to build the architecture of the new AQF. Further consultation will occur throughout this process.