

Victorian TAFE  
*Association*



Response

Strengthening the AQF: An  
Architecture for Australia's  
Qualifications

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Victorian TAFE Association  
Level 3, 478 Albert Street  
East Melbourne, Victoria, Australia

## **VICTORIAN TAFE ASSOCIATION RESPONSE**

### **STRENGTHENING THE AQF: AN ARCHITECTURE FOR AUSTRALIA'S QUALIFICATIONS**

The Victorian TAFE Association (VTA), representing fourteen TAFE Institutes and four multi-sector universities, is pleased to be able to continue to contribute to the discussions regarding the future AQF. The VTA congratulates the AQF Council on the high levels of engagement with stakeholders. VTA has this year contributed to the consultations around a common terminology for credit transfer and articulation and the initial proposal for strengthening the AQF. VTA is pleased to have been able to contribute to the current stakeholder consultations in Melbourne on October 12.

VTA notes the underpinning aspirations of a strong AQF including improved student pathways, enhanced graduate mobility and enabling mapping against international qualifications. VTA is pleased to note the proposed architecture described in the consultation paper avoids any explicit references to qualifications being aligned to one or another educational sector.

VTA in this response draws on submissions directly from members and on the views of Victorian TAFE providers attending a focus group convened in October 2009. VTA members may respond individually to the discussion paper to highlight areas of particular interest to their organisations.

#### **THE AUDIENCE**

It is unclear who the intended audience is for the information described in Table 1: AQF levels attributes and criteria, and Table 2: AQF Qualification Types Descriptors. VTA is assuming the information is only for qualification developers, curriculum specialists, accrediting bodies and the like and not for students/potential students, teachers, trainers and lecturers.

If the intention is that the document should inform students and those delivering education and training, then a rigorous review of the language is needed to avoid any ambiguity.

#### **AQF LEVELS**

VTA members have focussed their comments on Table 1: AQF levels attributes and criteria, and Table 2: AQF Qualification Types Descriptors.

##### **LEVELS**

VTA is disappointed that the AQF Council has chosen not to put forward a model that includes an enabling level. The VTA's previous response to the AQF Council consultation *Strengthening the AQF* stated that it is important that the English as a Second Language framework, Certificate of General Education for Adults and their equivalents in other states are included in the system. There is a case to be made for language, literacy and numeracy courses to be regarded as *enabling* and structured to be included in vocational qualifications as needed by a student cohort. VTA was pleased to see these elements in the examples provided on page 20 of the AQF

Council Consultation Paper *Strengthening the AQF: A Proposal* but these have disappeared from this consultation paper.

VTA suggests the AQF Council reference the Australian Core Skills Framework (<http://www.deewr.gov.au/Skills/Programs/WorkplaceEnglishLanguageandLiteracy/Documents/AustralianCoreSkillsFramework.pdf>) and the designated Foundation Skills Category for the Victorian government places as part of *Securing Jobs for Your Future* ([http://www.skills.vic.gov.au/\\_\\_data/assets/word\\_doc/0019/43453/2009-21---Att-2---Course-categories.doc](http://www.skills.vic.gov.au/__data/assets/word_doc/0019/43453/2009-21---Att-2---Course-categories.doc)).

VTA reaffirms the need to have an enabling level in a new AQF framework.

**Recommendation 1:** An enabling level is incorporated into a new AQF framework.

### **GENERIC SKILLS**

The Consultation Paper states that generic skills (employability, job ready, graduate attributes) have been integrated into descriptors. This is not transparent in Table 1. Generic skills can be seen in some of attributes and criteria but not others. Generic skills have relevance to each level and cannot be corralled to particular levels. Problem solving is relevant to levels 1-10. Creativity is equally relevant to levels 1-4 as 5-10.

VTA would like to offer an alternative perspective that generic skills are not part of the complexity of learning (Table 1). At level 3, for example, knowledge and skills are in the realm of factual, technical and routine yet the complexities of problem solving can be quite complex.

**Recommendation 2A:** AQF Council considers a separate framework be developed for generic skills with each of the agreed generic skills (technology, team behaviour, sustainability, communications etc.) having descriptors of the complexity at each of the AQF levels.

OR

**Recommendation 2B:** VTA recommends a review of the descriptors of learning outcomes to ensure the generally agreed generic skills are incorporated at each level.

### **TABLE 1: AQF LEVELS' ATTRIBUTES**

The usefulness of the descriptions of attributes attached to each level is not apparent to VTA members. In our view the criteria should unambiguously describe the knowledge, skills and the application of knowledge and skills and it would not be necessary to have broad brush attributes as described.

If overarching attributes are to be described these need to be better articulated and the points of differentiation need to be much clearer. As an alternative the attributes could refer to a particular level of technical skills and other attributes including employability skills, workforce mobility and commitment to lifelong learning.

Specifically in relation to the nomenclature used, care should be taken to use language consistently. As an example Level 3 only refers to *higher education and training* rather than *learning*.

## TABLE 1: LEARNING OUTCOMES

The points of differentiation between the levels need to be much more clearly articulated to distinguish each level and to ensure there can be no doubt that each level describes increasing complexity of learning. In the current example (Table 1), the skills outcomes for level 6 appear to be describing more complex skills than level 7.

Returning to the earlier comment about the audience for this information, if the learning outcomes are to be publicly available, the framework should clearly describe these as exit outcomes.

In the AQF Council *AQF National Policy and Guidelines on Credit Arrangements* Final Draft May 2009, credit arrangements are included in the arrangements to enable pathways. While this current Consultation Paper does not provide a definition of pathways VTA has made the logical linkage of the meaning in this paper to the *AQF National Policy and Guidelines on Credit Arrangements*. This connection leads to VTA's major criticism of the levels' criteria in Table 1. Providing an explicit continuum of learning outcomes assumes that all preceding levels will be deemed only as entry level into the next qualification in the hierarchy. While this may not be the intention, this could be the outcome. Table 1 fails to describe to the reader the varying complexity of learning leading to an exit point. The learning in Diploma qualifications may typically include some level 3, 4, 5 and 6 elements especially as the learner progresses through the Diploma. An Advanced Diploma may well include learning at levels 4, 5, 6 and 7. If a document like Table 1 is to be used to inform the construction of pathways, and logically will be used to inform the recognition of pathways (including credit), the gradations of learning within a qualification must be represented. VTA refers the AQF Council to the work undertaken by the Victorian Registration and Qualifications Authority (VRQA) in developing the Credit Matrix. Mapping of individual units within qualifications shows that particularly for Diploma, Advanced Diploma, Degree and Masters Degree qualifications the complexity of the learning spans several levels.

The Consultation Paper (page 6) states 'ultimately information about pathways will be included in qualification specifications. These are yet to be developed'. VTA is aware of the AQF Council Pathways project commissioned by the Deputy Prime Minister to improve the articulation and connectivity between the university and the VET sectors. VTA regrets that this consultation could not have been timed to include the outcomes of the Pathways project as the two are so intimately related. Pathways are an inherent part of describing connectivities between qualification types. Table 1 clarifies the differences in an hierarchical sense but does not clarify the connectivities or facilitate more consistent and rigorous recognition of learning and application of credit stated as a goal of the AQF taxonomy of learning outcomes (page 4).

**Recommendation 3:** The AQF Council reaffirms that the skills, knowledge and application of these are being described at the exit level.

**Recommendation 4:** The framework refers the reader to accompanying guidelines that provide examples and advice on the use of the framework in constructing pathways by explaining the gradations of learning complexities within and between qualifications.

## **AQF QUALIFICATION TYPES DESCRIPTORS**

In relation to the information provided as Table 2, VTA offers the following specific comments:

- Not all currently accredited Graduate Certificates and Graduate Diplomas have greater complexity of learning outcomes to Bachelor level qualifications. Table 2 harks back to the Higher Education model where Graduate Certificate is the first semester of a Masters degree and the Graduate Diploma the second semester of masters. This is a not a contemporary view of education. Graduate Certificates and Graduate Diplomas meet the needs of people looking to diversify their knowledge base and not necessarily holding an undergraduate qualification, or looking for post-undergraduate studies but at that level. There may be merit in considering qualification types for Graduate Certificate and Graduate Diploma separate from qualification types for Post-Graduate Certificate and Post-Graduate Diploma.
- As Australia moves towards one tertiary education sector, the review of the AQF provides an opportunity to revisit the separation of Vocational Graduate Certificates and Diplomas from Graduate Certificates/Diplomas. The use of the term 'vocational' stems from a qualification framework aligning qualifications to the various sectors. Clearly the current view, supported by VTA, is to ensure qualifications are not aligned to sectors.
- Each qualification has a separate level. Such a linear approach could lead to practices whereby Diploma and Advanced Diploma qualifications will only ever be seen as entry level to Higher Education. The varying complexity over the period of learning is lost. The model as presented could be a retrograde step for credit transfer, pathways and dual enrolments.
- Certificate III courses are not homogenous. Examples were described at the VTA focus group highlighting the differing complexity between qualifications at Certificate III in Cookery, Business Services and Children's Services. VTA members expressed some support for a separate qualification type for trade qualifications noting the outcomes of apprenticeship training are different to institution-based delivery. On the other hand, other VTA members believe a separate qualification type for vocational trade qualifications is not justified in a unified framework and could lead to disrupting pathways and progression from trade to paraprofessional qualifications.
- The AQF needs to be inclusive of all accredited courses including an enabling level that may include Certificate I courses and other foundation courses.

In summary the VTA asks the AQF Council to consider collapsing the information in Table 1 and Table 2 into one document to avoid duplication (and possible inconsistency) of information regarding knowledge, skills and application of knowledge and skills. The more detailed information in Table 2 could be used as a starting point.

## **NOTIONAL DURATION OF STUDENT LEARNING**

This question stimulated the most discussion among VTA members.

Completion of traditional trades apprenticeships (Certificate III) are typically more than 2 years including off-the-job and on-the-job training. Completion of the apprenticeship is not based solely on completion of the off-the-job AQF qualification. Describing Diploma qualifications as having notional durations of 1.5 – 2 years

assumes imbedded pathways and needs to be reviewed for consistency across the measurement. While specification around notional duration can lead to greater consistency in outcomes and improved quality, it will be important to have maximum flexibility in terms of volume measures so that qualifications can be designed and delivered to suit diverse markets and student cohorts. VTA suggests that if a measurement based on years is adopted for the AQF, the notional duration for Cert III be reviewed and may include 0.5 - 3 years with a notation in Table 2 the same as for Certificate IV.

There was considerable discussion regarding the use of a measurement of *years* compared to a measurement in *hours* and a diversity of views among participants as to a preferred measure. On the one hand was a view that the use of *nominal hours* attached to qualifications may be open to exploitation and that *years* gives an impression of substance and may contribute to building trust in a qualification (alongside assessment and delivery). On the other hand, the use of hours allows for measurement of partial qualifications for pathways purposes. A third view recommended that a sophisticated measure of applied learning time be developed to validate outcomes for inclusion in the activities of those developing and accrediting qualifications making judgements on the notional duration.

The use of a measure of volume based on notional duration of student learning in years has its roots in higher education where students complete units of study typically in institutional based settings (face-to-face and virtual). Such a methodology cannot be consistently applied to competency based learning with a multiplicity of choices to achieve qualifications with the learning occurring in workplace and/or institutional settings. VTA remains cautious regarding attempts to make the VET sector 'fit' custom and practice in Higher Education.

The paper states 'a measurement of the volume of learning is used to ... further clarify the relative complexity' (page 7). VTA remains unconvinced this is the case and is concerned that a measure of volume will be used inappropriately to determine credit arrangements.

Complexity is measured in terms of the learning outcomes not by the notional length of time engaged in the learning. While specifying minimum values are important for quality and consistency in contestable, demand driven markets, primarily it will be the responsibility of institutions and regulators to quality assure provision.

VTA looks forward to further consultations on these matters.

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