

Victorian TAFE
Association



Response

Strengthening the AQF: A Proposal

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Victorian TAFE Association
Level 3, 478 Albert Street
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VICTORIAN TAFE ASSOCIATION RESPONSE

STRENGTHENING THE AQF: A PROPOSAL

EXECUTIVE SUMMARY

It is timely that the AQF Council reflects on the current AQF and its relevance to 21st Century Australia and global post-compulsory education practices. The Victorian TAFE Association (VTA) endorses the work being undertaken to explore opportunities to strengthen the AQF to meet short, medium and longer term education and training needs.

The key messages to be read from the discussion below are:

- VTA supports the reframing of the AQF to avoid any references to qualifications being aligned to one or another educational sector.
- The current AQF objectives and the discussion in the paper to strengthen the objectives (page 8) are not sufficiently explicit around the creation of pathways and articulation.
- VTA endorses the development of an explicit taxonomy of learning outcomes to be used consistently to describe **all qualifications** in the AQF.
- Knowledge/Skills/Competence (KSC) taxonomy provides the opportunity to find a common language to integrate the terminology used in the different sectors: key skills (Schools), employability skills (VET) and graduate attributes (HE). A shared understanding of and respect for qualifications between practitioners in the education sectors will grow from a shared taxonomy.
- An explicit levels based structure could contribute to creating greater understanding of the value and complexity of qualifications across all education sectors and enhancing portability and recognition.
- Explicit reference levels could benefit Australian students seeking recognition overseas and for international students seeking Australian qualifications. The choice of a levels-based structure for the AQF may be influenced by the vision for Australian education globally.
- More will need to be done to change mindsets regarding the value and equivalence of qualifications particularly between VET and HE before true portability, credit recognition and articulation can occur.
- VTA rejects any proposal to measure the volume of learning based on the notional student learning time involved in achieving a qualification.
- VTA recommends that the AQF Council explore other measures of the volume of learning that can be applied to agreeing on credit for whole qualifications and be flexible to accommodate partial completions of qualifications.

THE INTRODUCTION

The Victorian TAFE Association (VTA) welcomes the opportunity to respond to the Australian Qualifications Framework Council Consultation Paper 'Strengthening the AQF: A Proposal'.

VTA members include four multi-sector Universities, fourteen stand-alone public TAFE Institutes, AMES and the Centre for Adult Education. Our members deliver training and education across the spectrum of the Australian Qualifications Framework including Senior Secondary School Certificates of Education, Vocational Certificates, Diplomas, Advanced Diplomas, Associate Degrees, Bachelor degrees and post-graduate qualifications. Delivery occurs in partnership with schools, universities, employers, governments and community organisations nationally and internationally. VTA is well placed to respond to the Consultation Paper.

The VTA in this response draws on the views of Victorian TAFE providers. VTA members may respond individually to the discussion paper to highlight areas of particular interest to their organisations.

PROPOSAL 1 – THE OBJECTIVES OF THE AQF

Education and training in Australia has evolved to a stage where there is blurring of sectoral boundaries between AQF qualifications offered in Schools, Vocational Education and Training (VET) and Higher Education (HE). Using Victoria as an example, it is common to find Senior Secondary Certificates of Education (SSCE) to be offered by Schools and VET providers, for Schools and Universities to be engaged in VET delivery and for VET providers to be increasingly engaged in providing awards previously the domain of HE providers (associate degrees, degrees, graduate certificates and graduate diplomas). Skills sets are a feature of learning in workplace/enterprise settings. A Qualifications framework describing qualifications according to educational sector is clearly out of date.

VTA supports the reframing of the AQF to avoid any references to qualifications being aligned to one or another educational sector.

VTA provides in-principle support for the alignment of the AQF with the policy goals it is designed to underpin and support. That said, it is difficult to fully comment when current policy goals are not necessarily clearly articulated. For example, a key policy intent is for the creation of an Australian tertiary sector yet the scope is yet to be defined. Our response in this instance is limited by a lack of understanding of what the Australian tertiary sector will be; key players and structures including qualifications.

Within that context, VTA submits that the current objectives and the discussion in the paper to strengthen the AQF objectives (page 8) are not sufficiently explicit around the creation of pathways and articulation. Rather than *help with developing* the AQF can *enable* participation by providers in the establishment of pathways and credit arrangements based on a mutual understanding of the equivalence of qualifications, including pathways into AQF qualifications from learning undertaken at work in formal/informal workplace learning outside the AQF.

Redevelopment of the architecture is required to achieve the breadth of objectives and to provide the basic structure for the future development of a credit system.

PROPOSAL 2A – A LEARNING OUTCOMES CLASSIFICATION

VTA agrees with the proposal that a learning outcomes classification or taxonomy is developed as the basis for the qualification descriptors in the AQF. Learning outcomes are commonly understood currency and can enable recognition of formal, non-formal and informal learning.

VTA members concurred that the current taxonomy is too general and open to interpretation and therefore open to inconsistent application. In response to Question 2, VTA endorses the development of an explicit taxonomy of learning outcomes to be used consistently to describe **all qualifications** in the AQF.

The taxonomy options provided on page 12 of the Consultation Paper generated diverse views and preferences among VTA respondents. All respondents supported the three dimensions of learning outcomes described – knowledge, skills and competence and the recognition of contextual competence and generic competence. Differences were expressed as to whether the generic competence should be embedded or as a separate dimension. While the majority of responses favoured a four dimensional KSC taxonomy with generic competencies as a separate dimension (Option B), a significant preference was also shown for Option A.

A key point of discussion was the nature of *core skills* under the umbrella of generic competence. This review to strengthen the AQF using Knowledge/Skills/Competence (KSC) taxonomy provides the opportunity to find a common language to integrate the terminology used in the different sectors: key skills (Schools), employability skills (VET) and graduate attributes (HE). A shared understanding of qualifications between practitioners in the education sectors will grow from a shared taxonomy. It is also important to think broadly about the nature of generic competence in contemporary Australian society, including the competencies needed to transition between jobs and occupations. Generic competence may also embrace citizenship, literacy and numeracy, resilience, design and sustainability. That said the taxonomy cannot become overly complicated.

PROPOSAL 2B – EXPLICIT REFERENCE LEVELS BASED STRUCTURE

There is already a widely held view in the VET sector that the qualifications in the AQF are equal to 'levels'. An explicit levels based structure would debunk that myth, and could contribute to creating greater understanding of the value and complexity of qualifications across all education sectors and enhance portability and recognition. An explicit reference levels based structure alone cannot guarantee shared understanding of the value of complexity and equivalence of qualifications. More will need to be done to change mindsets regarding the value and equivalence of qualifications particularly between VET and HE before true portability and credit recognition and articulation can occur.

VTA responding to the National Quality Council/COAG Joint Steering Committee consultation as part of the development of a draft policy framework for VET Training Products for the 21st Century noted, '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* rather than *vocational* and structured to be included in vocational qualifications as needed by a student cohort.’ (page 4). VTA is pleased to see these elements in the examples provided on page 20 of the AQF Council Consultation Paper.

The number of explicit reference levels generated a diversity of views. VTA is pleased to make comments based on the example provided but would have preferred clarification on the selection of the input model (National Qualifications Authority of Ireland nd) and any assessment of the advantages and disadvantages of each example in the Australian context.

Most discussion among VTA members focussed on Example 1 – 8+1 entry level and the first four stages of education (enabling – qualified/skilled worker). The following suggestions are offered:

- VTA supports the reference to ‘literacy, numeracy, access and employability courses’ at the enabling level of Example 2. Amend the Enabling level in Example 1 to include the same words.
- Example 1, amend level 1 to include Year 11.
- Example 1, review levels 2 & 3. A Certificate III may be a skilled worker in one occupation yet be deemed a progression to skilled employment in another.
- The meaning of the term ‘intermediate’ in the sixth stage of education was not clear. Any language that artificially implies value must be avoided.

Explicit reference levels could benefit Australian students seeking recognition overseas and for international students seeking Australian qualifications. The choice of a levels-based structure for the AQF may be influenced by the vision for Australian education globally.

PROPOSAL 2C – AN ASSIGNED MEASURE OF THE VOLUME OF LEARNING BASED ON THE NOTIONAL STUDENT LEARNING TIME INVOLVED IN ACHIEVING A QUALIFICATION

VTA rejects any proposal to measure the volume of learning based on the notional student learning time involved in achieving a qualification. The use of ‘notional hours’ is inherently flawed because there will not be consistency in the underlying assumptions to determine ‘student effort’. The use of a measurement based on notional student learning time has its roots in HE where students complete units of study typically in institutional based settings (face-to-face and virtual). Such a methodology cannot be applied to competency based learning with a multiplicity of choices to achieve qualifications with the learning occurring in workplace and/or institutional settings. A first year apprentice, for example, undertaking a Certificate III in Automotive would possibly spend one day per week studying and four days per week learning in the work setting as well as completing some learning activities outside this time. What proportion of the week would be deemed ‘student effort’? Notionally for an apprentice in the first year of their apprenticeship the majority of their work time may be deemed ‘learning’.

VET qualifications have been developed to maximise customisation to industry needs and the structure of a qualification can vary significantly depending simply on the packaging chosen. Is it reasonable then to deem the volume of learning of one

graduate of a Diploma in Accounting higher than another student simply because the packaging is linked to higher notional 'student effort'?

Third, the nominal hours attached to Training Package units that would form part of the calculation of 'notional student learning' can vary from state to state as they are agreed by individual training authorities and linked to providers' funding. Students in one jurisdiction may be disadvantaged if the notional student learning time includes the nominal hours and these are less in the state the student is learning in. National qualifications do not have identical nominal hours.

A measure of volume of learning based on the notional student learning time is problematic because the merit based HE sector and the competency based VET sector are distinct; a point clearly made by the Bradley Review of Australian Higher Education and articulated by the Deputy Prime Minister in public addresses following the release of the Report of the Review of Australian Higher Education.

The proposal in the Consultation Paper to measure volume of learning based on notional 'time' ignores the inherent language, philosophical and pedagogical differences between VET and HE delivery, particularly in relation to VET Certificate I – III qualifications. It is inappropriate to make the VET sector 'fit' custom and practice in HE.

As noted by Box Hill Institute of TAFE in responding to the AQF Council Consultation Paper individually, 'any measure of volume of learning must address the salience of both practice and theory to have credence and explicitly articulate the differences between different levels and types of qualifications'. The AQF National Policy and Guidelines on Credit Arrangements Final Draft May 2009, page 21, clearly describes equivalence as being about the content and the scope of learning.

VTA recommends that the AQF Council explore other measures of the volume of learning that can be applied to agreeing on credit for whole qualifications and flexible to accommodate partial completions of qualifications.

CONCLUSION

VTA reaffirms in-principle support to review the current AQF objectives and broaden these in line with policy goals that will impact on the Australian Qualifications in the short, medium and longer term. Of particular interest to the VTA are improvements to the AQF that will enable accessible, transparent, credit pathways between VET and HE based on mutual respect for the value of the qualifications achieved by graduates and the complexity of the learning.

VTA endorses the development of an explicit KSC taxonomy of learning outcomes, possibly with generic competence as a discrete dimension, to be used consistently to describe all qualifications in an explicit reference levels-based structure. In any levels-based structure, VTA supports the inclusion of an enabling level with specific reference to literacy, numeracy, access and employability courses. The choice of a levels-based structure for the AQF may be influenced by the vision for Australian education globally.

VTA does not support any proposal to measure the volume of learning based on the notional student learning time involved in achieving a qualification and recommends the AQF Council undertake further research on alternative models for measuring

volume of learning with a view to developing a unique methodology to suit the Australian Schools/VET/HE contexts.

The proposed reforms to the AQF must be considered in the context of the outcomes of other current initiatives: COAG's Human Capital Reform Agenda, the Bradley Review into Higher Education, Skills Australia's consultations 'Foundations for the Future' and the National Quality Council/COAG Joint Steering Committee initiative to develop a draft policy framework for VET Training Products for the 21st Century.

VTA looks forward to further consultations on these matters.

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