Australian Qualifications Framework Review

VICTORIAN
TAFE
ASSOCIATION

Victorian TAFE Association Response

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1. Introduction

The Victorian TAFE Association is the peak body for Victoria's public providers of Vocational Education and Training (VET), including 12 TAFE institutes, four Victorian dual sector universities, and an Associate member, AMES Australia.

The Victorian TAFE Association welcomes this opportunity to provide comment to the Australian Qualifications Framework (AQF) Review. Our comment is built around the following themes:

- The AQF hierarchy
- Regulation
- Volume of Learning and credit points
- Terminology
- Micro-credentials
- Generic skills and coordination
- Other issues

2. The AQF hierarchy

The front cover to the second edition of the AQF includes a diagram that depicts the ten levels of the AQF as a continuous circle. By contrast, the material inside the document is presented in a way that implies the AQF is a 'ladder'. The former implies a framework that lacks stratification and is 'non-directional'; by contrast, the ladder implies a hierarchy that moves 'teleologically', from lower to upper, where one does not move 'back' but moves ever 'upwards'.

While this may seem a trivial observation, it would be fair to say that the dominant conception of the AQF is congruent with the ladder: a one-directional hierarchy where one's qualification journey commences at the 'lower' end and moves inexorably 'higher'. Implied in this is that, once a level is 'extinguished', all future pursuits of education and training should occur only at a level higher than previously obtained.

Were this a matter of 'schematics' alone there would be no problem, but this way of viewing the AQF is present in policies that encourage qualification gain in one direction only, and worse, do not facilitate the pursuit of qualifications at levels 'lower' than those already attained.[1] Further, it inculcates a notion that qualifications at the top have greater intrinsic value than those beneath them.

But while the levels on the AQF are designed to recognise increasing levels of knowledge and complexity, they should not be seen to represent an educational journey where one moves from lower to higher. Nor should one consider qualifications at the top of the spectrum to be inherently 'better' than those at the bottom.

The qualifications on the AQF should instead be seen as 'tools' that one can draw upon to fulfil a requirement or need. At one point, the correct tool may be the knowledge and skills delivered through a Certificate IV, while at another, it may be achieved through a Diploma. Importantly, one should be able to draw on whatever tool is required irrespective of whether

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[1] For example, a person who holds a master's level degree and wishes to undertake training at a certificate level would be unable to access subsidised training, even if the certificate is key to securing employment. This barrier also applies to those undertaking qualifications within VET, such as a person who holds a Diploma obtained in a VET institute who then chooses to undertake a trade course at Certificate III. (See, for example https://www.swinburne.edu.au/current-students/manage-course/fees/loans-discounts/skills-first/,accessed 18 January 2019).

or not one holds a so-called higher tool in her or his possession. This would require a move away from notions that hold that a qualification is 'better' or more desirable because it is placed higher on the AQF, to one that values all forms of learning and qualifications and appreciates them for the role and function they fulfil.

The need to move away from a hierarchy is likely to grow in importance and magnitude, given the increasing requirement for lifelong learning. In the VET sector alone, 66 per cent of students are 25 and older, while those who are 45 and older represent about a quarter of the entire VET student cohort.[2] Indeed, the continued transformation of the Australian economy suggests that more and more Australians will need to regularly retrain and reskill, requiring that all relevant policy instruments (including the AQF) be designed to recognise and support this growing reality.

The Victorian TAFE Association recommends that the review give consideration to proposals that would challenge the teleological hierarchy of the current AQF, to instead develop an AQF that encourages Australians to draw from the qualification that best suits their learning needs. While some of the issues outlined above are more reflective of problems related to implementation, some thought should be given to how the current structure of the AQF encourages and reinforces this hierarchical view.

The Victorian TAFE Association also suggests the inclusion of a statement or recommendation from the review that makes clear that the AQF should not be seen in these strict hierarchical terms, stating that policies and initiatives related to its implementation should abandon such strict hierarchies and instead support and encourage learning requirements that best meets a learner's needs, wherever it sits on the Framework.

3. Many masters

Australia's tertiary education sector is currently (mostly) overseen by two bodies.[3] Higher education is managed by the Tertiary Education Quality and Standards Agency, while the VET sector is overseen by the Australian Skills Quality Authority. The dual structure is no doubt born of a view that persists in seeing the tertiary education sector as comprising two distinct parts: namely, VET and higher education.

A consequence of the split in regulatory function is disparities in the manner in which the AQF is administered and interpreted. These disparities can be drawn to multiple factors, including 'loose' terminology in the current AQF that makes its application open to widely different interpretations; and differences in teaching methodology (the VET sector is competency-based while higher education is 'curriculum' based). It is also likely to be reflective of cultural and historical factors that have traditionally seen a far heavier hand applied to the regulation and management of the VET sector compared to higher education.

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[2] National Centre for Vocational Education Research (2018), *Australian vocational education and training statistics: total VET students and courses 2017 — data slicer*.

[3] The use of the word 'mostly' is done to recognise the many other bodies that have some role in the sector's oversight. The many bodies that oversee the VET sector help to illustrate this point. While VET is ostensibly overseen by ASQA, it is subject to the Australian Competition and Consumer Commission on matters relating to consumer protection; the Australian Securities and Investment Commission on matters relating to private for-profit Registered Training Organisations; and the Commonwealth's Department of Education and Training in areas such as the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS). Further, there exist regulations levied by bodies at the state government level, such as the Victorian Department of Education and Training and the Victorian Registration and Qualifications Authority. Each of these has some role in interpreting and implementing the AQF within their regulatory remits.

Whatever their source, these regulatory differences add a level of complexity and burden that is felt most acutely by education and training providers whose activities straddle the two regulators, but whose impact is ultimately felt by all.[4] But as noted in the Discussion Paper, the split in responsibilities has diminished the effectiveness of the AQF to drive "greater coherence across Australia's tertiary education system".[5] And in an increasingly interconnected education sector with lines that are progressively blurred, the split in regulatory function becomes both undesirable and untenable.

In 2007, the Bradley review raised the prospect of bringing together responsibility for regulatory oversight, stating that this would do much to address "barriers to forging closer links between VET and higher education" and would "strengthen the overall coordination of the tertiary education and training system", including, presumably, to the operation of the AQF.[6]

The Victorian TAFE Association therefore considers that the review should explore how current regulatory arrangements impact upon the effectiveness of AQF. Consideration should be given to whether the system would be better served by having a single tertiary sector regulator to provide oversight. If such a recommendation is accepted, then the review should also provide advice on how to achieve such a change. The Victorian TAFE Association considers that the review should also recommend the development of a set of AQF guidelines that addresses regulatory inconsistencies and to foster greater cohesion in the application, interpretation and intent of the AQF, particularly as it intersects and interacts with regulatory matters.

4. Volume of Learning and credit points

The VET sector's competency-based VET system is built on an understanding that a "learner's rate of progress is determined by their demonstrated competency, rather than by how long they have spent training". Further, in this system, training providers are given the "flexibility to deliver the 'amount of training' that caters specifically to learners' individual needs".[7] For some learners, this level will be high, while for other, more experienced learners, the level required will be reduced.

In short, Australia's VET system is an outcomes-based system. Its success or otherwise is measured against its ability to produce graduates who can demonstrate pre-determined outputs, which are defined in terms of competencies.

By contrast, Australia's higher education and school sectors use a 'curriculum based' approach. Such systems are more 'input' focused, stipulating the knowledge that is to be imparted through a given course of study with (explicit and implicit) requirements that a student demonstrate the development of skills and abilities such as critical thinking.

The development of the AQF was inspired in large part by an "increased interest in articulation and recognition of prior leaning" and a desire for greater "credit transfer arrangements between the schools and the VET and the VET and higher education

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[4] Such as Victoria's four dual sector universities and five of its 12 standalone TAFE institutes, which are also registered higher education providers.

[5] A good example of how coherence is affected is in the treatment of Volume of Learning. While both TEQSA and ASQA reference the AQF in their standards and other policy documents, the interpretation of this important indicator differs markedly: one (ASQA) monitors this strictly, the other (TEQSA) is less focused on it.

[6] Australian Government (2009), *Review of Australian Higher Education: Final Report*: 183

[7] Australian Skills and Quality Authority (June 2017), *A review of issues relating to unduly short training*: 9

sectors".[8] And so given this aim, one would expect that the AQF would be written and constructed in a manner that accommodates the different approaches in methodology employed in Australia's education sector.

Such a framework would be flexible enough to accommodate the VET sector's competency-based approach, while also providing a means to account for the curriculum-based methods of the higher education and school sectors. Moving from this, for the AQF to 'speak' to the VET sector, it should avoid input measures.

The AQF is, on the whole, successful in this endeavour, bar for one, lone indicator: Volume of Learning. The Volume of Learning is said to represent the "complexity of the qualification type"[9]. This is done through the proxy of time, where the *typical* duration of a given qualification serves to represent complexity. But by using time in this way, the complexity of learning has been transformed into an input measure. As a consequence, a tension has been created between the output-focused VET sector and the AQF.

The Victorian TAFE Association recognises that attempts have been made to provide some flexibility through the inclusion of terms such a 'typical' or 'notional', that is, to the *typical* duration of a given course of study. Generally, the inclusion of the term 'typical' in policy is intended to give some flexibility in application; to account for those moments or scenarios where some nuance in treatment is warranted, and/or to recognise and accommodate the diverse situations that are likely to arise.[10]

But this is problematic on two counts. First, there is no typical duration for an outcomes focused approach. There may be an *average*, but this is different to typical. The second problem is one of application: the implied flexibility has not translated into regulatory practice, and Volume of Learning is more often treated as a 'mandated' requirement, as the following statement by ASQA from its review of 'unduly short'[11] courses suggests:

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[8] Keating, Jack (2003), 'Qualifications Frameworks in Australia', *Journal of Education and Work,* 16(3), 277-288: 277.

[9] Australian Qualifications Framework Council (2013), *Australian Qualifications Framework* [second edition January 2013]: 11

[10] The desire for some level of flexibility was implied by the explanation of the term provided by the AQF Council, which notes that a given qualification "may be offered in more or less time than the specified volume or learning, provided that delivery arrangements give students sufficient opportunity to achieve the learning outcomes of the qualification type, level and discipline". The AQF goes on to say that the "concept of 'typically' used to describe the volume of learning is intended to provide some flexibility in relation to pathways into and from AQF qualifications". See Australian Qualification's Framework (2014), *Volume of Learning: An Explanation*: 1 (https://www.aqf.edu.au/sites/aqf/files/volume-of-learning-explanation-v2-2014.pdf, accessed 21 February 2019).

[11] The use of quotation marks warrants explanation. In a competency-based system, a course of study can only be said to be unduly short when a provider enables a learner to 'graduate' despite the learner not demonstrating attainment of pre-stated competencies. This implies, *ceteris paribus*, that the provider has not appropriately recognised nor provided the amount of training required for the specific learner to achieve pre-stated competencies. In other words, when one says that a course is an unduly short course, what one really means is that the course has been poorly conceived, delivered, or both.

*More than a quarter of the 11,677 advertisements reviewed on ASQA-regulated RTOs' websites that advertised duration for training package qualifications have a **course duration below the minimum of the Australian Quality Framework** (AQF) Volume of Learning range. [bold added][12]*

The Victorian TAFE Association therefore recommends that consideration be given to removing Volume of Learning as an indicator from the AQF. This 'blunt' input measure seems counter to the broader aims of the AQF, namely, to provide some certainty regarding the outcomes (knowledge, skills) associated with undertaking a given course of study. It is incongruous with the aims and methods of Australia's competency-based system, and seems a poor way to measure qualification complexity.[13] Instead, the time allocations placed against the qualification types seem more a reflection of historical practice with respect to qualification duration than a measure of complexity.

If the inclusion of Volume of Learning was motivated (in addition to its role as a proxy for complexity) by a desire to give some certainty regarding course duration or to avoid issues of 'unduly short' courses, a better approach would be to erect mechanisms and provide adequate resources for regulators to more easily measure whether associated outputs are achieved.

While the Victorian TAFE Association applauds the review for recognising difficulties with the current approach, we are hesitant to support a credit point system before greater information on its operation is made available. If, as the Discussion Papers states, credit points represent hours of learning,[14] then adoption of this approach seems more cosmetic than substantial: at its core, course complexity is still based on the input measure of time spent studying (albeit with the veneer of a credit point). If such a change is recommended, the Victorian TAFE Association proposes that scenarios be developed that demonstrate how the credit point system would work in the VET sector, and once completed, for these scenarios to be tested with key representatives from the education sector and industry.

5. Terminology

The Victorian TAFE Association is supportive of the proposal to remove duplicate descriptors, as outlined in Table 2 of the Discussion Paper. However, in accordance with the recommendation outlined in section 4 of this document, we consider that the Volume of Learning indicator be removed altogether.

The successful application of the AQF hinges on the ability for regulators, educators and others to successfully understand the intentions and purpose of the descriptors. Current language in the AQF lacks precision, which as noted elsewhere in this submission, can prove problematic for interpretation and implementation. But against this, it is imperative that the Framework be written in a manner that is flexible enough so as to be useful in multiple scenarios and to cater to future evolution.

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[12] Australian Skills and Quality Authority (June 2017), *A review of issues relating to unduly short training*: 4

[13] Consider that the AQF stipulates a Volume of Learning requirement of six months to one-year for a Certificate I, and three to four years for a Doctoral degree. If the Volume of Learning is indeed a measure of complexity, then read in its most crude, direct and mathematically obvious terms, a Doctoral degree has a level of complexity at its upper bound of only six to eight times that of a Certificate I.

[14] The example provided in the Discussion Paper is that one credit point would be equivalent to ten hours of learning.

One way to achieve greater precision and consistency in interpretation is to draw from practice in legislation. In some instances, legislation includes examples or scenarios to demonstrate the use and application of a given provision.[15] Such examples enable users to more readily identify the intention of the provision. The inclusion of examples in the AQF could similarly give guidance to regulators and others on how to implement and interpret descriptors and provisions.

To accommodate the teaching methods of the entire education sector and of the AQF, the Victorian TAFE Association considers that the descriptors and supporting language should aim to be output or outcomes focused.

6. Micro-credentials

A recent survey by Deloitte on attitudes to lifelong learning found that many Australians are choosing to re-educate and train themselves using products that fall outside of the AQF. It found that about 30 per cent of workers are undertaking non-AQF qualifications, while 38 per cent are planning future study through non-AQF options.[16] Further, while 78 per cent of "study interested workers are willing to access study through Australian higher education and/or Vocational Education and Training providers", almost half (45 per cent) reported a preference for 'bite-size' intensive learning".

The Deloitte results point to two realities. First, the desire and need for an education and training sector that is able to provide training in smaller quanta in a flexible and responsive manner; and second, an apparent difficulty in fulfilling this need through the current AQF. The inability of the AQF to satiate this need has resulted in increasing use of micro-credentials (or to use the VET sector term, through the provision of training in 'skill sets').[17]

Micro-credentials are "mini-qualifications that demonstrate skills, knowledge, and/or experience in a given subject area or capability" and can be "awarded for soft and hard skills".[18] In many respects, 'micro-credential' and 'skill set' are simply new terms for a far older activity: the delivery of short form education and training courses to address an industry or professional development need. Traditionally, these sorts of courses do not result in a qualification or credential, though in some cases they do come with evidence of attendance or completion.

Micro-credentials function "as supplements to traditional" qualifications, and in the United States alone, "growing momentum" towards their use has already resulted "millions of micro-

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[15] For example, Queensland's Retail Shop Leases Act 1994 includes examples under various paragraphs and provisions to outline how the provisions in question are to be applied. (see https://www.legislation.qld.gov.au/view/pdf/inforce/current/act-1994-047 accessed 19 Feburary 2019).

[16] Deloitte (2018), *Higher Education for a changing world: Ensuring the 100-year life is a better life*: 7, 27.

[17] In the case of VET skills sets, they would enable a person to draw on a 'few' units in order to meet some training need without having to complete an entire qualification. For example, a person who holds a generic cookery qualification but who wishes to increase skills in a particular form of cuisine may undertake a unit associated with that cuisine without having to undertake an entirely new qualification. Current funding arrangements make such a pursuit problematic in some states (such as Victoria), though there have been moves in others jurisdictions to enable this kind of activity through 'part-qualifications' (for example, NSW). Further, while the self-accrediting status of universities gives them the flexibility and ease to create micro-courses to meet a niche need, no such facility exists for the TAFE and VET sector, making it more difficult for this sector to respond to industry and community requirements.

[18] DeakinCo (24 October 2017), 'What are micro-credentials and how can they benefit both businesses and employees?' (see https://www.deakinco.com/media-centre/news/Benefits-of-micro-credentials-for-business-and-employees, accessed 27 February 2019).

credentials…being issued". A recent survey of company executives in the United States found that a large majority (64 per cent) agreed that "continuous lifelong learning will demand more credential attainment from job seekers and higher levels of education in the future". [19] The survey's authors noted that the "growing need for continuous learning" has resulted in an "explosion" of new [micro-credential] educational credential offerings", which is likely to gain more momentum into the future. [20] If this is the case, then micro-credentials are likely to grow in significance.

But as their significance grows and their share of qualifications grows with it, current informal approaches to their management are unlikely to be effective. Further, their growing share is likely to undermine and strain the key 'comparison and exchange' function of the AQF (that is, in its role to enable ease of comparison and security regarding the expected outcomes of a course of study), rendering the AQF more and more ineffective.[21] There is, therefore, a need to recognise micro-credentials in some formal way, and to ensure that they work harmoniously with the qualifications in the AQF.

Moving from this, the Victorian TAFE Association supports proposals to recognise micro-credentials in some official manner. There is a preference for this to occur through a full embrace of micro-credentials within the AQF 'architecture' and not through the development of a separate micro-credential framework that sits outside the AQF (which is the approach taken by some jurisdictions). However, if a separate framework is recommended, it is imperative that it is accompanied by a facility that enables clear dialogue and translation between the two.

7. Generic skills and policy coordination

A hallmark of the VET sector is its ability to meet and satiate the skill needs of industry and employers. Indeed, the training system that underpins VET in Australia is rooted in the needs of industry, with industry given a central place in the design and development of training.

Despite the central role of industry, even the VET sector is not immune to calls for training that enables graduates to 'hit the ground running'. Very often, the kinds of skills that are called for are of the more generic kind, what this review has referred to as enterprise and social skills.

Calls to provide generic skills are not a new, but implied in these calls is the suggestion that responsibility for their inculcation and development sits with the education and training sector. But such a view suggests a misunderstanding how such skills are developed, and diminishes the important role of industry (and the community) in ensuring the development of such skills.

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[19] Gallagher, Sean (15 February 2019), 'A new era of microcredentials and experimental learning', *University World News: The Global Window on Higher Education*, https://www.universityworldnews.com/post.php?story=20190213103113978, accessed 21 February 2019.

[20] Gallagher, Sean (15 February 2019), 'A new era of microcredentials and experimental learning', *University World News: The Global Window on Higher Education*, https://www.universityworldnews.com/post.php?story=20190213103113978, accessed 21 February 2019.

[21] This warrants some explanation by analogy. Post-war regulation of Australia's financial sector was largely limited to the activities of the banks. Over time, banks and others in the financial sector sought to avoid these regulatory requirements by purchasing or creating Non-Bank Financial Institutions (NBFI), which were not subject to regulatory requirements. In time, this saw a shrinking of banking activity and a rise in the share of NBFIs, making regulatory arrangements increasingly ineffective.

This point is raised because to give more prominence to generic skills in a formalised manner within the construct of the AQF could serve to reinforce an erroneous view that lays the burden for their development on the education sector only and lessens the important role of industry and the wider community.

As referenced elsewhere in this document, the AQF is made up of a number of output descriptors that enable a graduate to demonstrate the attainment of knowledge and skills at a given qualification level. While outputs (knowledge, skills) could be readily developed for some generic skills, for many others, such a task would prove difficult. Further, while some generic skills might be accommodated within AQF's 'hierarchical' structure and its implied increasing level of complexity, for others, this would be difficult to achieve. [22] To demonstrate the attainment of stipulated generic skills, some education and training providers may develop token 'generic skills units' or find some other 'obvious' manner to show that they meet the requirement.

An alternative to generic skills in the AQF would be to develop greater coordination between the AQF and the Australian Core Skills Framework (ACSF). The ACSF provides a framework of five core skills (including generic skills) and the expected level of attainment at five different levels. Currently, the levels in the AQF do not match those in the ACSF, causing some confusion for educators, trainers and students. While the ACSF does not cover each of the generic skills outlined in the discussion paper, those that it does cover are sufficiently ecumenical so as to translate across diverse scenarios. Therefore, an alternative to the inclusion of generic skills in the AQF could be to create greater alignment and complementarity between the two frameworks.

8. Other issues

The Victorian TAFE Association wishes to briefly comment on three further issues:

- *AQF Levels 5 and 6*: AQF levels 5 and 6 are currently jointly 'owned' by the VET and higher education sectors. Despite this, problems can be encountered when articulating from an AQF level 5 qualification owned by the VET sector into an AQF level 6 qualification in higher education.[23] Similar issues may be encountered in the other direction, from a higher education qualification into a VET qualification. The AQF aim for seamless transition often fails in such cases, with articulation solutions often *ad hoc* and relying on agreements and relationships at the level of individual representatives in participating educational institutions. But such reliance on individual relationships is problematic, and can result in changes to articulation arrangements if/when there is a change in personnel.[24]
- *Shared vision*: the operation of the AQF depends on the sectors that are subject to it being aware of and supporting its implementation. Feedback from Victorian TAFE Association members suggests that some education sectors are not aware of the AQF or of their obligations under the Framework. Some of this may be due to different regulatory apparatuses, but whatever the cause, the Victorian TAFE Association recommends that the review consider initiatives to raise awareness of

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[22] For example, one can equip a student with knowledge on what it means to be a team player, but one cannot ensure that a graduate demonstrates the skills or attributes to be a team player.
[23] See https://www.wodongatafe.edu.au/courses/22313VIC/Certificate-IV-in-Tertiary-Preparation, accessed 28 February 2019.
[24] Wodonga TAFE's "CareerDirect" program provides an example of how resource intensive articulation arrangements can be for TAFE institutes and their students (see https://www.wodongatafe.edu.au/careerdirect, accessed 28 February 2019).

the AQF across the various sectors and to their roles and responsibilities, so as to maximise the Framework's reach and effectiveness.

- *Drawing from multiple sources*: the Victorian TAFE Association considers that some facility should be included to enable courses to easily use materials from qualifications that may be at different levels. For example, a person undertaking a Bachelor of Education could benefit from units taught under the Certificate IV in Training and Assessment. Consideration should be given to policies that facilitate this kind of activity.

9. Key contact

The VTA welcomes the opportunity to speak further to the issues outlined in this submission. To do so, please contact:

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