

**AQF Council  
Strengthening the AQF: A Proposal  
Consultation Paper, May 2009**

**Innovative Research Universities (IRU) Australia Response**

Ms Ann Doolette  
Executive Director, AQF Council

Thank you for the opportunity to comment on proposed approaches to strengthening the Australian Qualifications Framework (AQF).

IRU Australia supports the intention to strengthen the AQF, in particular to:

- Enhance the objectives of the framework
- Create a more contemporary AQF architecture
- Achieve ‘greater consistency in how qualifications are designed, in determining their qualification type and also where they sit in relation to other qualifications in a strengthened framework’.

In seeking a more nationally consistent qualifications framework, however, an appropriate balance needs to be struck between clarity of expectations attached to different qualifications and qualification levels and provision for appropriate diversity across education and training sectors, fields of education, professions, local contexts and modes of educational delivery.

IRU Australia also emphasises the importance of achieving consistency and clear alignment between a number of key developments which are currently progressing in parallel to the work of the AQFC:

- AUQA’s work on academic standards as outlined in its Discussion Paper on Setting and Monitoring Academic Standards for Australian Higher Education
- The establishment of the Tertiary Education Quality and Standards Agency (TEQSA).

IRU Australia looks forward to working with the Council and other institutions on strengthening the AQF framework.

**Question 1: What changes should be made to the existing statement of objectives of the AQF to reflect national education and training goals? (Section 1.3, p 8)**

IRU Australia agrees that a key objective of the AQF should be to ‘help with developing flexible pathways which assist people to move more easily between the different education and training sectors’. We also agree with the conclusion of the Bradley Review that ‘it is critical that higher education and VET remain distinct in their educational offerings and roles’.

Articulation between the sectors can be inhibited at times due to differences in terminology, assessment methods and relative emphasis on knowledge, skills, and competencies. There is scope to enhance connectedness between the sectors but the distinctive characteristics of the sectors should be maintained and supported by the AQF.

IRU Australia agrees that the framework should be a tool which facilitates the development and accreditation of nationally recognised and consistent qualifications and the authorisation of providers to deliver and issue nationally recognised qualifications. Given the planned establishment of a national accreditation authority (TEQSA), we also agree with the proposal in Section 3 of the Consultation Paper to establish a public national register of accredited qualifications and providers.

**Question 2: Should an explicit taxonomy of learning outcomes be used consistently to describe all qualifications in the AQF? (Section 2.4, p 12)**

IRU Australia supports the development of a consistent and explicit taxonomy of learning outcomes which will:

- Assist in the development and accreditation of qualifications, facilitating decision making regarding the location of qualifications and leading to greater national consistency
- Facilitate more consistent recognition of learning and application of credit
- Improve the comparability of Australian qualifications with those of other countries.

The taxonomy, however, needs to be responsive to the distinctive missions of the different education and training sectors and should not act as a significant barrier to diversity and flexibility either within or across sectors.

**Question 3: If an explicit taxonomy of learning outcomes is used, will students and employers be better served by Option A or Option B? (Section 2.4, p 12)**

IRU Australia supports the adoption of the knowledge skills and competence (KSC) taxonomy of learning outcomes.

Our member universities share the concern of employers, as expressed in the consultation paper, ‘that graduates should have adequate skills in learning to learn, problem solving, and communication and are able to use technology relevant to their workplaces’,

We argue, however, that generic competences are and must usually be demonstrated and evaluated within a given discipline or field and not in a decontextualised generic domain. For the most part, what learners demonstrably know and can do belongs to rather specific contexts and domains and does not easily transfer. For example, problem solving in physics is quite different from problem solving in law as is problem solving in psychology.

We note that the research evidence for ‘generic competences’, where they are conceptualised as a separate dimension of learning, is very weak and unpersuasive and the claims in support of them are vastly overstated. They seem plausible when made in the abstract but soon collapse when concrete examples are considered. To refer to the same capability the competence either has to be stated so generally as to be meaningless or has to be specified so closely as to be no longer general.

For these reasons, IRU Australia would favour a KSC taxonomy with embedded generic competences linked to context (ie. Option A).

**Question 4: How could explicit level descriptors for each AQF level enhance Australian qualifications and their use? (Section 2.9, p 19)**

Valid, meaningful and useful descriptors could inform the delivery, evaluation, and improvement of qualifications. An explicit reference levels-based structure may also provide better mobility and international recognition of qualifications.

There are some issues which will require careful consideration in developing explicit level descriptors for each AQF level. For example, the Department of Education, Employment and Workplace Relations currently differentiates in its Higher Education Student Statistical Collection between Graduate Diplomas ‘involving new academic, professional or vocational area’ and Graduate Diplomas ‘extending skills and knowledge in a professional area previously studied’. In addition, Masters degrees are increasingly used as a first exposure to an area of professional study. Expectations relating to the differences between a postgraduate qualification in a new academic, professional or vocational area and an undergraduate qualification will need to be clarified.

Care will also need to be taken to ensure that explicit level descriptors do not work against existing or potential learning pathways for students. For example, Table 7 could be interpreted as suggesting that a Senior Secondary Certificate of Education is required for entry to a Certificate IV. The practice, however, has been to accept Certificate IV as a substitute for year 12 for entry to higher education.

The explicit reference levels also need to avoid any inference that a core purpose of VET qualifications is to qualify students for entry to higher education. VET qualifications must be recognised and valued as qualifications in their own right, designed to meet specific national skill needs.

Consistent with current practice in Australia and overseas, the Associate Degree should remain as a two year equivalent full-time qualification appropriate for preparation for paraprofessional employment.

**Question 5: What number of explicit reference levels would best illustrate and encompass the increasing complexity of Australian qualifications? (Section 2.9, p 19)**

IRU Australia has no clear preference on the number of levels that would best serve the Australian education sector. We have a preference for clarity and simplicity in the development of reference levels.

**Question 6: What is the best process to use for locating each qualification type in a levels-based structure? (Section 2.9, p 19)**

IRU Australia would like to be involved in the consultation process that will contribute to the location of qualification types in a levels-based structure. The process should be informed by the judgement against clear level descriptors of a panel of independent experts in the relevant domains of various qualification types.

**Question 7: Would a measurement of the volume of learning add value to AQF qualifications and support improved credit arrangements? (Section 2.11, p 23)**

**Question 8: What is the best process to use to determine the credit point value, with reference to the level, for each AQF qualification type? (Section 2.11, p 23)**

In practice, universities do commonly invoke a ‘volume of learning’ model in defining course rules, student workloads and credit points. There are differing views across our membership, however, about the value of adding a volume of learning component to a strengthened AQF.

Arguments against adding a volume of learning component are centred around the strong view that a contemporary qualifications architecture should be consistently and coherently outcomes and standards-based. In this context, a volume of learning component is judged to be an inadequate proxy for learning outcomes, reflecting ‘time served’ rather than standards of achievement.

Arguments for adding a volume of learning component are centred around the desirability of nationally-agreed norms which protect against the emergence of qualifications which clearly step outside accepted standards (e.g. six-month Masters degrees). As the range and number of providers offering higher education qualifications rapidly expands, and competition for students increases, so does the risk of the liberal invention of inappropriate degree configurations.

IRU Australia would nevertheless caution against the adoption of a rigidly prescribed volume of learning component of the AQF. We emphasise the following points:

- Notional learning time, as a measure of the volume of learning, must be defined as the time it takes a student, on average, to complete *all* learning activities required for the achievement of a qualification. The AQF should not seek to define the hours of class contact time required to achieve a qualification, as this legitimately varies substantially across fields of education, professional qualifications and modes of delivery.

- The qualifications framework needs to retain sufficient flexibility to accommodate historical and current diversity in practice across fields of study. For example, a Bachelor of Engineering or a Bachelor of Medicine will typically involve more than the 3600 hours of learning suggested in Table 9. If a highly prescriptive approach to defining volume of learning was to be adopted, either a different qualification type would need to be created to cover examples such as these or the qualification would need to be awarded at a higher level (e.g. Masters). It may be preferable to define minimum notional hours of learning only for a given qualification rather than setting minimum-maximum ranges.
- Given that international education is now Australia's third largest export industry, careful consideration needs to be given to the impact any AQF volume of learning requirements might have on Australia's competitiveness in the international student market. In the UK, for example, Masters degrees continue to be offered as one year full-time equivalent qualifications despite the UK being a signatory to the Bologna accord which specifies two years full-time equivalence after a pass Bachelor's degree.
- The inclusion of a volume of learning component will not necessarily make any significant improvements to credit transfer arrangements between vocational education and training and higher education. Universities are more focused on the learning outcomes achieved in VET qualifications and students' consequential readiness to succeed in university education in the chosen field of study than they are on volume of learning.

#### **IRU Australia Contacts:**

Professor Kevin McConkey  
 Chair, IRU Australia Academic Group  
[Kevin.Mcconkey@newcastle.edu.au](mailto:Kevin.Mcconkey@newcastle.edu.au)  
 p: 02 4921 5114

Ms Lenore Cooper  
 Director, IRU Australia  
[l.cooper@griffith.edu.au](mailto:l.cooper@griffith.edu.au)  
 p: 02 6684 3863  
 m: 0408 760 592

#### **Member Universities:**

Flinders University  
 Griffith University  
 James Cook University  
 La Trobe University  
 Murdoch University  
 The University of Newcastle