



**RESPONSE TO THE AUSTRALIAN QUALIFICATIONS
FRAMEWORK COUNCIL'S CONSULTATION PAPER:**

***Strengthening the AQF: A Framework for
Australia's qualifications***

August 2010

Introduction

TAFE Directors Australia (TDA) provided substantial responses to the AQFC's discussion papers in 2009 (www.tda.edu.au) and now welcomes the opportunity to comment on the AQF Council's *Strengthening the AQF: A Framework for Australia's qualifications* (July 2010).

TDA provides a national voice for the public vocational education and training (VET) sector. Australia's TAFE Institute network is the largest and most diverse tertiary education sector in Australia, with more than 1300 locations across Central Business Districts (CBD), suburban, regional and remote locations. Many Institutes offer further services through the Asia-Pacific and other offshore regions. The core business of TDA is to support its member Institutes and advocate for quality skills in Australia.

TAFE institutes nationally are the major deliverers of accredited training and education across the spectrum of the Australian Qualifications Framework including senior secondary school certificates, vocational certificates, diplomas, advanced diplomas, associate degrees, bachelor degrees and post graduate qualifications. These qualifications are delivered in a range of contexts – institutional, workplace and online. They are delivered in partnership with a variety of national and international organisations, including schools, colleges, universities, enterprises and community organisations to domestic and international student markets. As such, a robust and internationally comparable qualifications framework is vital national Australian Qualifications framework is fundamental to the quality of TAFE institute core business.

TDA's response to the AQFC Consultation Paper

TDA congratulates the AQFC on its development of a unified qualifications framework that covers all three sectors of the Australian education system. We agree with the AQF Council Chair's observation that new AQF will maintain Australia's international leadership and ensure the high regard for Australian qualifications both nationally and internationally.

In particular, TDA supports the use of a common taxonomy and level descriptors with a focus on graduate outcomes. However TDA believes that there are still some significant flaws in the current framework and offers the following observations:

1. The misalignment of the Senior Secondary Certificate of Education (SSCE) with the Certificate III Trade qualification

TDA cannot accept the attribution of the Senior Secondary Certificate of Education (SSCE) to Level 3, the same as that assigned to trade and other skilled occupational qualifications in the proposed structure. TDA strongly believes that the proposed qualifications structure undermines the status of 'technical skills necessary to perform certain work and learning activities' (Glossary p69).

The SSCE is preparatory for further studies *and* work. It does not meet the proposed Level 3 descriptor requirement that '*a graduate at this level will have knowledge and skills for skilled work*' (Table 1 and p. 24, emphasis added). SSCE graduates do not have the skills to '*select and apply a specialised range of methods, tools, materials and information*' for any skilled occupation as do graduates of Certificate III courses. At best the '*technical and procedural knowledge*' delivered as part of the SSCE is at Certificate II/Level 2.

An increasing number of commencing apprentices complete their SSCE before commencing their apprenticeships and major employers are now expecting this as the normal entry level for Certificate III trade programs. Equating the outcomes of the SSCE and Trade qualifications will significantly downgrade the skill value of the Certificate III trade qualification that is vital to Australia's skills base. It is also likely to encourage an escalation and re-badging of trade qualifications to a higher level with a consequential and very costly impact on industry.

We note that the introductory section of the Consultation Paper includes a statement on the research commissioned by the AQFC from a '*consortium of researchers recognised nationally and internationally for their expertise in psychometric testing and item response modelling techniques*' (p. 5). This is an interesting assertion and TDA looks forward to reviewing the research. However, that research is yet to be published and therefore cannot be independently assessed for its relevance and reliability as a basis for assigning and aligning AQF qualifications and levels. Pending such a review, there is no evidence to support the presumption in the Consultation Paper that the SSCE and Trade Qualifications should be assigned to the same AQF level or that the SSCE does indeed achieve the outcomes stated by the Level 3 descriptor.

(i) TDA recommends that the SSCE be assigned to AQF Level 2 as the level which most accurately describes the average outcomes achieved by a graduate. If this is deemed to be impractical or politically unacceptable, then the alternative of not specifying a level at all for the SSCE should be further explored.

2. The provisions for pathways and linkages

TDA believes that the most important contribution of the new AQF will be in restructuring the relationship between qualifications to create a more integrated and seamless post-school education system in Australia. TDA has been active in promoting the pathways and linkages between qualifications, particularly between Levels 5, 6 and 7 where improved arrangements will be a critical and determining factor in the development of a more integrated tertiary education system. This work has included continuing consultation with Universities Australia (UA) and the publication of a UA/TDA Joint Statement. The Statement includes an agreed definition of 'tertiary' education qualifications as those '*at diploma level and above, including where these qualifications may embed pathways from the qualification level below*'. The Statement also sets out agreed principles on which a more integrated tertiary system could be built. A copy of the Statement is attached to this response.¹

TDA supports the inclusion of a statement on pathways and linkages as part of the specifications for each level of qualification in the proposed structure. However, as currently drafted, this statement reflects an approach which threatens to diminish rather than enhance student movement between qualifications in at least two ways.

Firstly, the generalisation that entry '*is usually based on completion of a lower level AQF qualification*' is introducing a barrier that does not exist in the current AQF, and implies a lessened emphasis on equity and access. It is contrary to a fundamental principle of curriculum design in both the VET sector and, increasingly, in higher education. TDA supports the need for guidance to be given on course entry and progression requirements. Entry requirements should reflect the current best practice in Australian education, and be

¹ See Attachment 1: Joint TAFE Directors Australia/Universities Australia Statement on Tertiary Education; <http://www.tda.edu.au/resources/Joint-TDA-UA-statement-April2010.pdf>. See also TAFE Directors Australia, 2010, *A Blueprint for Australia's Tertiary Education Sector*, www.tda.edu.au.

based on the principle of specifying the minimum skills necessary to successfully undertake a program leading to an AQF qualification; and

(ii) TDA recommends that the references to entry requirements based on lower level AQF qualifications be deleted and that the AQF guidelines be amended to include reference to best practice in minimising entry barriers and optimising opportunities.

Secondly, TDA has a concern with the mandatory requirement for accreditation documentation to 'include documented negotiated arrangements for articulation and credit transfer to higher level qualifications'. This needs to be paralleled by a statement on the obligation of a receiving institution to document pathways and credit into higher level qualifications as part of *its* accreditation documentation. This is clearly the intent of the Pathways and Linkages policy included in the Consultation Paper (p. 50). However, if it is not also made explicit in the specifications for each qualification level, the obligation will continue to rest largely with the graduating qualification/ institution when, in practice, the resistance to pathway development has more frequently been experienced in the receiving, higher level qualification/ institutions that have the power ultimately to determine articulation and other pathways.

(iii) TDA recommends that, the AQF specifications for each qualification/level stipulate the obligation for the accreditation of higher level qualifications include documented provisions for articulation and credit transfer **from** lower level qualifications.

3. The concept of 'qualification types' lacks clarity and unnecessarily limits the flexibility of the Framework.

The inclusion of qualification types as an intermediate category between Level and Qualification descriptors appears to be superfluous and the definition in the glossary adds nothing to the definitions of qualifications and levels. For example, there appears to be no reason to distinguish Advanced Diplomas and Associate Degrees as different 'types' – they are different qualifications at the same level, albeit with different nomenclature.

The inclusion of qualification type as an integral component of the Framework is all the more confusing because, while the strengthened AQF does not distinguish qualifications by sector, the Framework designates both Vocational and higher education Graduate Certificates and Diplomas as the same 'qualification type'. (Table 2 p.17). TDA does not support the continuation of this sector specific nomenclature and the assignment of

qualifications with different nomenclature to the same 'qualification type' obfuscates, rather than clarifies their equivalent value as Level 8 qualifications.

The draft policies on qualifications issuance (pp. 48ff) and on the 'Addition or Removal of AQF Qualification Types' (pp. 57ff) suggest that the intention is to designate and authorise the specific AQF nomenclature or 'qualification titles' that may be used for qualifications at each level. If so, the Framework should be amended to refer in plain English to 'approved qualification titles' rather than 'types'. This is particularly important in respect of the summary Tables 1 and 2 which at present fail to clearly convey the rule that only AQFC-approved nomenclature may be used.

(iv) TDA recommends that the concept of qualification type be abolished and replaced in the Framework and its supporting policies by reference to 'approved qualifications titles' (or 'approved qualification nomenclature'), and that the definition of qualification title and/or nomenclature be included in the glossary.

TDA has a second and equally important concern about the draft policy on 'Addition or Removal of AQF Qualification Types'. Contrary to its stated aim of enhancing flexibility and responsiveness, this policy appears to introduce an intentionally greater degree of rigidity into the Framework so that any qualification with nomenclature other than that already specified as a 'type' will need to be approved by the whole AQF Council. This restrictive approach is likely to affect TAFE Institutes (and private providers) more than universities, most of which have the statutory autonomy to determine their own qualifications nomenclature.

TDA members are particularly concerned at the implications of this policy for the introduction of well-recognised overseas qualifications. The most important of these is the possibility that some TAFE Institutes may offer Foundation Degrees on the UK model. These would appear to readily fit the AQF structure at Level 6 and, clearly, each Foundation degree would require Australian accreditation. However, the arrangements proposed in the AQF Consultation Paper would require an as yet unspecified and far more laborious approval process for the inclusion of a new 'type' rather than a new qualification and would directly involve the whole of the AQF Council with, apparently, no further avenue of (non judicial) appeal against an unfavourable decision.

(v) TDA recommends that, consistent with recommendation (iv), the policy which controls the addition of new qualification nomenclature should not be applied until a more feasible and flexible approval process has been formulated.

4. International linkages should be clarified

The proposed strengthening of the new AQF will set a new world benchmark for national qualification frameworks. Nevertheless, it is important that our international students, as well as the significant number of Australians studying or working overseas, can be assured of having their Australian qualifications recognised. This could be greatly facilitated by a mapping of the AQF qualifications to the International Standard Classification of Education (ISCED).

(vi) TDA recommends that the publication of the new AQF include a map of its relationship with the ISCED.

Attachment 1: Joint TAFE Directors Australia/Universities Australia Statement on Tertiary Education; <http://www.tda.edu.au/resources/Joint-TDA-UA-statement-April2010.pdf>