

# Review of Australian Qualifications Framework

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Submission to the AQF Expert Panel  
March 2019

## Introduction

The Australian Chamber of Commerce and Industry (Australian Chamber) welcomes the opportunity to make a submission to the Australian Qualifications Framework (AQF) Expert Panel (the Review) in response to their discussion paper.

## A clearer statement of goals and value-add

The AQF is a relatively complex part of the education system architecture. Its role is not readily understood by education stakeholders outside of the provider network. Each part of the education system has a qualifications hierarchy that serves its own sector, more needs to be done to explain the goals and value-add of the AQF which sits above the qualifications framework of each system.

Unfortunately, the discussion paper only provides minimal guidance on the practical impact of the AQF other than in negative terms. The discussion paper itself states, “AQF objectives to help promote a more coherent tertiary system have not been realised” (page 9). Although the Review does not put the existence of the AQF up for debate, this does not negate the need to restate or, if necessary, re-set the goals of the AQF and outline the value that an overarching framework delivers for the education system.

### **Recommendation 1: Clearly articulate the goals and value-add of the AQF**

In its final report, the Review Panel should more clearly articulate the goals of the AQF and the value that it adds to the education system that is not otherwise delivered through the internal framework of each part of the education system.

## International alignment

One of the most promising areas of potential value-add of an overarching AQF is the ability to align outcomes from the Australian education system with education systems in other countries. This is particularly important for international measurements such as the Programme for International Student Assessment (PISA). However, even in this role, the alignment is not straight forward when compared with the International Standard Classification of Education.

Figure 1 is a table from the Australian Council for Educational Research (ACER) report on educational expectations drawn from PISA research<sup>1</sup>. According to the ACER report, “The International Standard Classification of Education (ISCED) is a framework for classifying information on education and qualifications. As different countries have different educational systems, qualifications and nomenclature, this framework is used to allow cross-country comparisons of education.” However, as can be seen from the table, there is imperfect alignment, and as an example, our Certificate III levels are on the same level as Years 10 and 11. The lack of direct alignment does have an impact on the usefulness of the research, and in the case of this research on educational expectations, it creates difficulties in determining a 15-year-old’s expectation of doing Vocational Education and Training (VET) after school, with the exception of the higher levels of VET.

Figure 1: Alignment for PISA analysis

PISA 2015 Australian question phrasing	ISCED level equivalent
Lower secondary schooling (up to and including Year 10)	ISCED level 2
Year 10 or 11 and then a TAFE training Certificate III (e.g. in Hairdressing or Accounts Administration)	ISCED level 3B or C
Year 12	ISCED 3A
A TAFE Training Certificate IV (e.g. in Hairdressing or Bricklaying)	ISCED level 4
A TAFE Diploma (e.g. Diploma in Accounting, Diploma in Veterinary Nursing)	ISCED level 5B
A university degree	ISCED level 5A or 6

ISCED = International Standard Classification of Education

Exact international alignment will be virtually impossible to achieve, and raising the issue is done to reinforce the importance of clearly identifying what the AQF does do well and where there are shortcomings.

<sup>1</sup> ACER (2018), *PISA Australia in Focus: Number 2 Educational expectations*

## Problem with the hierarchy

Another potential purpose of the AQF is to draw VET and higher education together under a tertiary system. As already noted, according to the Review Panel, the AQF has not really achieved this purpose. The current limited articulation between the systems would have likely occurred without the framework.

One of the disadvantages of the current AQF sitting across both systems is that it reinforces a hierarchical advantage of higher education over VET, with all of the VET levels below higher education, except at level 6.

This poses the question of whether the AQF, and our education system and even society more generally, puts a higher value on knowledge as compared to skills. For example, a graduate of a Certificate III, in plumbing or electrical work, is required to operate with a high level of autonomy and take responsibility for installation and repair of complex systems. The market rewards these skills monetarily often at least as well, if not better than many of the higher education graduates, but our education system places their learning four levels lower.

Again, the Review Panel is not being asked to resolve these fundamental issues and inconsistencies, but it reinforces the point that the role of the AQF should not be expanded or its importance raised as there are already too many issues that make its role problematic.

### **Recommendation 2: AQF should not be expanded**

AQF should not be expanded or its importance raised as there are already too many issues that make its role problematic.

## Volume of Learning

Another key area that is very challenging and one which the AQF incorporates into its framework at each of the qualifications levels is the volume of learning. Although it would be logical in a framework that the volume steps up for each level, in reality, the volume of learning descriptors matches pre-existing practice. This is inconsistent for a system that implies hierarchy but is a practical approach to the reality of delivery. Even within each level, there is a significant range, particularly at Certificate IV (6 months to 2 years) which recognises the variations between short duration specialist qualifications and longer duration qualifications. Given that some Certificate IVs are apprenticeships over a longer period, it potentially should also have the same comment that Certificate III does.

As a matter of principle, industry has concerns about volume of learning being applied to VET given that it is a competency-based system. It must continue to be clear with the guidance around the AQF that for VET, the volume of learning is a notional guidance and should not be used for regulatory compliance.

Given this context, it is not supported that the volume of learning levels be reset or converted from years into credit points based on hours of learning. This would imply greater specificity where there is a need for the ranges to continue to be broad.

### **Recommendation 3: Volume of Learning should not be more specific**

Volume of Learning in the AQF should remain as guidance only, particularly in relation to the competency-based VET system. Volume of learning should not be converted to a credit point system.

### **Make it simple**

Given that the discussion paper puts forward for consideration a number of potential new inclusions in the AQF which would lead to an expansion of its role, as an overarching comment, it is recommended that the AQF become simpler rather than more complex. Adding further elements will only add to its imperfection.

The argument for greater simplicity and minimal change is further reinforced by the political and timing issues around this review. A review of the AQF needs to be concurrent to any major review of tertiary education. The Government has initiated a review of VET that may have implications for the AQF. Stakeholders are not, as yet, privy to its finding. With a federal election due within months, it is also relevant that the Opposition is firmly committed to a whole-of-tertiary review and this would definitely have implications for the AQF. This strengthens the argument for the Review Panel to be circumspect in making any major recommendations for change, although observations about options would be useful.

### **Recommendation 4: The AQF should be simpler and confined in its role**

The AQF should be as simple as possible, delivering on a clearly defined and confined role.

### **Micro-Credentials**

Micro-credentials including VET skill sets are an important part of the education system and will be increasingly so due to the strong need to improve access to learning throughout working life. We understand a number of stakeholders, particularly in higher education, perhaps guided by a recognition of this importance, have recommended their inclusion in the framework. While agreeing with the importance of micro-credentials, we urge the Review Panel to resist inclusion.

In a recently released report by AlphaBeta<sup>2</sup>, it is predicted that over the next twenty years the average Australian will spend an additional 3 hours per week in education and training, with a 33 percent increase across their lifetime. Australians will need to double the share of learning they do after the age of 21, and most of the extra learning will occur through work as well as short, flexible courses.

To reflect the importance of skill sets and micro-credentials, it would be appropriate in the guidance narrative around the AQF to refer to their increasing role in the system. However, to incorporate them into the framework itself would be problematic and add complexity. Skill sets can capture units from across the levels of the AQF, and even within a level are unlikely to meet all learning outcomes prescribed in the AQF.

The primary value of micro-credentials is their flexibility and ability to be used to fill gaps in an individual's or businesses' capability. Given that business needs are likely to evolve at an increasingly rapid rate, having micro-credentials sitting outside the overarching qualifications frameworks would allow greater flexibility for VET and higher education to adapt their rules around accredited micro-credentials to suit the changing circumstances. While bringing micro-credentials into the AQF may add legitimacy to the role of the micro-credentials it will come at too high a cost of inflexibility and complexity, even if a workable way could be found to incorporate them.

### **Recommendation 5: Micro-credentials should not be incorporated into the AQF**

The importance of micro-credentials including VET skill-sets should be emphasised in the guidance narrative of the AQF but should not be included in the framework itself.

## Foundation or Soft Skills

The discussion paper explores whether what is termed as “enterprise and social skills” should be included in the framework. Firstly, it is important to note that there is no uniformity about the terminology, and the terms “enterprise and social skills” would be the least used in industry. Each education sector has its own terminology (example: schools - general capabilities; higher education - generic skills), as well as long-standing terms such as foundation skills including employability skills used by industry and VET. The employability skills have been based on the original 2002 Business Council Australia and the Australian Chamber employability framework. Terminology such as job readiness skills, 21<sup>st</sup>-century skills or even future skills has emerged more recently.

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<sup>2</sup> <https://www.alphabeta.com/wp-content/uploads/2019/01/google-skills-report.pdf>

There is no doubt that “enterprise and social skills” or “soft skills” (to be all encompassing of non-technical skills), are vitally important to workplaces, and their inclusion in courses of study and training are essential to producing job-ready graduates.

However, experience from being a member of the advisory group for the development of Core Skills for Work (CSfW) dating back to around 2012 demonstrated the difficulty in allocating these “soft” skills to levels. It was recognised that there was no alignment with the qualifications framework, as higher performance levels of certain foundation skills are needed in lower level occupations. For example, high-level skills in customer service, communications, and interpersonal skills are required for Level II and III customer facing roles common in hospitality and retail. Given these difficulties, it would be very challenging to put these “soft” skills within the framework in any specific way. Instead, as a recognition of their importance, the guidance around the framework should specify that it is a requirement that qualifications at all levels should embed enterprise skills.

In specifying this requirement, there needs to be greater clarity around what skills we are referring to and what language is used to describe them. It would be beneficial for the Review Panel to support the need for a national discussion to better define the skills and the terminology. This is an action the Australian Chamber has been calling for within the conversation around the reform of the training products, where the terminology of future skills was introduced as being separate from foundation skills.

### **Recommendation 6: “Soft skills” should be a requirement for every qualification**

Recognising the importance of “soft skills”, the AQF should specify that they are included in every qualification level, but not attempt to be specific within the framework itself as to what those skills are. Specificity about the skills should be incorporated into the guidance narrative around the framework, and in order to inform that, the Review Panel should support a national discussion to refresh existing “soft” skills lists and arrive at common terminology.

## Senior Secondary Certificates

The Senior Secondary Certificate (SSE) should continue to sit within the framework but with an unallocated level. It is hard to envisage why it would be easier for tertiary providers to recognise the potential knowledge and skills a student obtains at school if it was included at a particular level. It was surprising to read in the discussion paper that some universities provide credit to SSCE graduates for particular subjects, and it can only be assumed that they are higher levels of learning in certain specialist areas. That said, to the extent that it is occurring in a limited scale, allocating a level to the SSCE should not make this more widespread, as such credit should operate on a case by case basis reflecting the particular circumstances.

It is also difficult to see from an industry perspective how much value can be created in recognising that knowledge and skills delivered as part of the SSCE encompasses a broad range of the AQF.

### **Recommendation 7: SSCE should not be allocated a level in the AQF**

The existing status of the SSCE within the framework but with no level allocated should remain.

### **Summary**

The role and value-add of the AQF needs to be more clearly articulated. It should have a clearly defined role and sit as a simple framework across the education systems. To retain that simplicity, additional inclusions in the framework should be minimised.



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### **About the Australian Chamber**

The Australian Chamber of Commerce and Industry speaks on behalf of Australian Businesses at home and abroad.

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