



Response by the Australian College of Educators to  
*Strengthening the AQF: A Proposal*  
a Consultation Paper issued by the AQF Council, May 2009

## **Preamble**

The Australian College of Educators (ACE) is a national professional association which represents educators in the school, VET and higher education sectors at all stages, from career entrants to managers and leaders. It covers the public and private systems. It is therefore well placed to understand the importance of the AQF and to comment on proposed changes.

An AQF that functions well, and that is easily understood and widely adopted, is an important pre-cursor to a national system of education and training, including its regulation and quality assurance. Current moves to reform higher education and vocational education and training resulting from the work of COAG, the Bradley report<sup>1</sup> and the current discussion paper of Skills Australia<sup>2</sup> will depend for their success on effective foundation mechanisms such as the AQF. ACE is therefore pleased to offer comment on the AQF Consultation Paper.

In general terms, ACE supports the intentions of the revision and the general thrust of what is proposed. It accepts that some of the detail will be changed following consultation processes but understands that the overarching notions of taxonomy, levels and credit point allocations are likely to remain. We, therefore, focus our comments in those areas.

We would like to make the general observation that the final model should be sufficiently flexible that diversity in our education system is not constrained. There is good sense in a framework document that promotes standards, encourages ease of movement and transfer, and describes the elements of our educational system in an easily understood manner. However it should not be so prescriptive as to make innovation in program development and delivery difficult for providers of education and training. We see no explicit evidence to that effect in the discussion paper but believe that some aspects might be made clearer as we discuss below.

We also emphasise the importance of recognising non-formal or unconstrained learning in developing skills and expertise and are pleased to see its discussion in the Consultation Paper. It is not clear, though, as to how the revised AQF will give appropriate recognition to informal knowledge and skills acquisition, particularly in measurements of volume of learning.

## **Taxonomy**

ACE supports the taxonomic definition given in Sect. 2.4 of the Consultation Paper but asks for a re-consideration of the descriptions currently under the element called Competence to make its intent regarding the important matter of generic skills more evident. The elements of

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<sup>1</sup> *Review of Australian Higher Education*, Australian Government, December, 2008.

<sup>2</sup> *Foundations for the Future, Draft Proposals for the Future Governance, Architecture, and Market Design for the National Training System*, for consultation, Skills Australia Position Paper, April 2009.

Knowledge and Skills are sufficiently clear, and seem to be applicable to the broad range of qualifications relevant to the AQF. However, we believe Competence, as described in both Options A and B, does not recognise sufficiently the differences among some programs of education. As an example, the generic qualities listed are often the hallmark of professional disciplines such as engineering, law, actuarial studies and medicine and belong more properly under the Skills heading. We favour Option B because of its specific focus on generic competence but ask for a re-wording that recognises that what is generic to some qualifications is core to others.

Another option might be to call the third element, that sits alongside Knowledge and Skills, Context & Broadening. The intention is to capture those additional competencies required to make the person completing the respective program understand the general context within which they will work, make them aware of areas cognate to their own and to ensure they are not narrowly specialised.

## **Levels**

The two example reference levels given in Table 7 of the Consultation Paper are reasonable frameworks upon which to describe the relativities of Australian qualifications and to permit comparisons with overseas qualification structures. We favour an option similar to Example 1 with fewer levels since it seems that more flexibility is available to providers if there is less specificity. Later we offer another model that the AQF Council may wish to consider. Although not suggested as necessarily better than Example 1 it is simpler and allows for HE developments not currently incorporated in the Table 7.

## **Credit Points**

While it is attractive to contemplate the allocation of credit points over the various levels of qualification, as in Table 9, it is important that the ranges chosen reflect properly the relative effort at a given level, clearly a difficult proposition because of the variety of different types of qualification, particularly in the universities. As an illustration, bachelor degrees can be of 3, 4 or more years duration; it seems unusual to try to capture those variations within an hour range of 3000-3600. Likewise, an honours year following the completion of a three year program may be more demanding on an annual basis than each of the previous three years and perhaps should be recognised as such. It would be of value to re-visit those matters in devising the final form of the revised AQF, along with the need to embed flexibility, as implied above.

## **Another Approach**

Provision must be made in the AQF for the easy incorporation of innovative degree programs such as the 'Melbourne model' in which the University of Melbourne has foregone the traditional suite of undergraduate degrees in favour of a small set of comprehensive undergraduate programs followed by professional graduate degrees that provide specialisation. The model must also easily account for the differentiation between coursework and research Masters degrees and the availability of professional doctorates. None of those is evident in the structure of Table 9, although we can build them into a model as outlined in Fig. 1 following. This is a banded structure similar in some respects to the current AQF segmentation by sector, but is segmented instead by broad qualification type. The bands are overlapped in some cases to recognise the different sectors for which each band is relevant. It is provided as an example of a different approach that could be developed further if it proved attractive.

Although not shown in Fig.1 there may be value in an entry level that recognises the first formal secondary school qualification.

Because there are fewer and more broadly defined levels, establishing international comparators with this approach will involve a many-to-one mapping of overseas levels to this structure: several levels of most of the overseas models will be equivalent to a single layer here. Its major difference is that it keeps the levels simply described and relevant to broad employment qualifications.

## **Concluding Remarks**

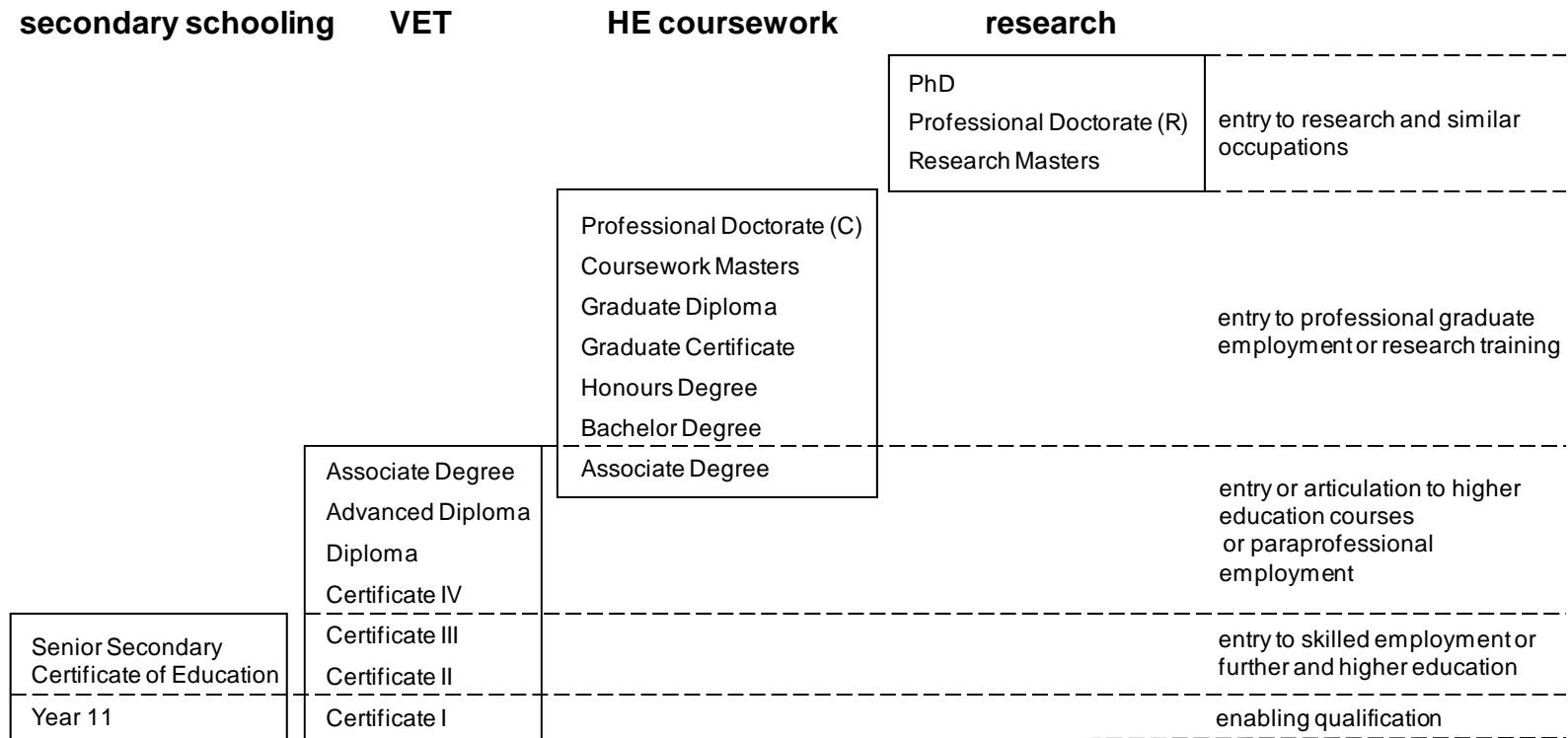
To get widespread acceptance of a new AQF the final model chosen needs to be meaningful and easy to apply. The structure outlined in the Consultation paper is supported, in principle, by ACE, but may need refinement and simplification as discussed above to ensure its adoption by providers at all levels. Otherwise its importance as an essential foundation for the future of Australia's education system may be compromised.

## **Contact**

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**Fig.1.** A different model with fewer reference levels, defined by broad occupational qualification. The (C) and (R) against professional doctorates recognise that some are predominantly based on coursework and some on research.