



**Australian Business Deans Council**  
**Response to the Review of the Australian**  
**Qualifications Framework**

14 March 2019

The Australian Business Deans Council is the collective voice of all Australian university business schools, which graduate one-third of all students and more than half of the international students, at the nation's universities.

Our 39 members teach and research the areas vital to the success of the businesses that underpin Australia's economy.

As their peak body, ABDC's role is to make business schools better and to ensure that those with political, social, cultural and economic influence appreciate and support how business education contributes to Australia's future.

# ABDC Draft Submission to AQF Review

## Introduction

This document provides a response to the Review of the Australian Qualifications Framework (AQF) from the Australian Business Deans Council (ABDC).

The ABDC is broadly in agreement with the points raised in the AQF Review Discussion Paper and welcomes the opportunity to comment on the document and the AQF Framework.

The ABDC is committed to the ongoing development of the AQF so it can continue to provide clarity through a qualification framework that supports educational pathways and focuses on clearly defined graduate outcomes.

As outlined in the Discussion Paper, it is essential for the AQF to remain relevant to the modern labour market, given the changing nature of work and the growing importance of new skills and learning methods. Any changes to the AQF should allow Australian qualifications to be easily compared to those gained in other countries or jurisdictions. With the increasing globalisation of tertiary education, students need the ability to transfer in and out of the Australian education system as seamlessly as possible.

The ABDC's response to the AQF Review focuses on the Major Contextual Issues (section three of the Discussion Paper) and Areas for Major Change (section four). Only limited attention is given to AQF Policies and Explanations as most of the suggestions in section five seem self-evident.

ABDC welcomes opportunities to provide more input into the review process in the future.

**Professor David Grant**  
**President, Australian Business Deans Council**

## Section 3: Major Contextual Issues for the Review

The ABDC agrees with the contextual drivers of change outlined in the Paper, particularly the changing nature of work and the emergence of new skills and learning methods impacting the education system. The move from routine to higher-level technical and professional jobs may require additional AQF levels or the refinement of existing levels. The framework must be adapted to capture the lifelong learning of people up-skilling throughout their working lives. As learning becomes more flexible and closely linked to market demands, the AQF needs to show students and employers how qualifications relate to employment outcomes. This supports the argument for AQF recognition of short courses later in this response.

The ABDC supports greater AQF emphasis on the transferable skills that are not necessarily technical and linked to a specific discipline or job. In the rapidly changing labour market these skills, which are the least likely to be replaced by machine learning and outsourcing, allow people to move most easily between jobs. Through the *Learning Standards* project the ABDC has strongly supported embedding these skills in the business curriculum.

As student and labour market mobility continues to increase, the AQF Review should give greater attention to the global transferability of Australian qualifications. Any future version of the AQF needs to make it easy to compare Australian qualifications to qualifications frameworks in other countries or jurisdictions.

### **Response 3**

- **Agree with the contextual drivers of change outlined in the Paper**
- **Support greater AQF emphasis on transferable skills**
- **Need to make it easy to compare Australian qualifications with qualifications from elsewhere.**

## Section 4: Areas of Possible Change

### **4.1 A Wider Range of Credentials Should Be Included in the AQF**

With the growing importance of short-courses in education and training, the ABDC supports the AQF including alternative forms of credentialing. Short courses play a critical role in opening up educational pathways and delivering education and training linked to specific skillsets. In the future they will be critical to building stackable qualifications better matched to an individual's employment and developmental needs. Including short-course credentials in the AQF will give students and employers greater certainty about the quality of these educational products and how they may link to other qualifications.

The Discussion Paper argues for new short-form credentials to meet the same inclusion criteria as other types of qualifications (see page 15 of the Paper). The ABDC argues that some criteria could be relaxed or changed for short-form credentials. For example, Criterion Five for inclusion in the AQF states that a qualification must *have clear pathways within the AQF*. However, some short courses are undertaken to gain a specific skill at a point in time and are not intended to be linked to future courses of study. Similarly, Criterion Six states that a course must *be able to be located at an existing level within the AQF*, but sometimes a skill or learning activity is not linked to a specific AQF level.

The ABDC supports the idea of classifying these types of credentials by purpose, as happens in countries such as Denmark, Scotland and Ireland. As the Paper says, the purpose of short-form credentials could include preparation for work, preparation for study, skills and knowledge extension, building on previous awards, and general interest. This could be used as a system for classification (see discussion on page 17). However, it raises the question of *who defines purpose?* For example, an education provider may run a short course in financial planning with the intention of linking it to a knowledge extension, but a student may choose to take the course solely out of general interest.

The notion of *volume of learning* does not provide greater certainty for short-form credentials so, instead, these credentials should be defined by outcomes attained through completion of a course. Short courses have been at the forefront of educational innovation using methods like intensive delivery, online delivery, and self-paced learning – modes of delivery that make it difficult to come up with an agreed upon volume of learning for each type of credential. A focus on outcomes achieved, rather than the volume of learning, will make these types of qualifications more meaningful to students and employers.

#### **4.1 Response**

- **Support the AQF including alternative forms of credentialing**
- **Support relaxation or change of some inclusion criteria for short-form credentials**
- **Support classification of short-term credentials by purpose**
- **Support credentials being defined by outcomes rather than volume of learning.**

#### **4.2 There Should be Better Treatment of Enterprise and Social Skills in the AQF**

Enhanced treatment of enterprise and social skills in the AQF will recognise their growing importance in the labour market – a market where people will experience greater mobility, many jobs require teamwork and communications skills, and people perform service-style roles.

ABDC recommends focusing on *employability skills* rather than *enterprise skills*. The term *enterprise* relates more to skills used in a business start-up, entrepreneurship and/or commercialisation.

We believe that the concept of *employability skills* is understood more readily by students and potential employers. It also talks to a set of skills that will enable people to move easily from one career to the next. Alternatively, this section could refer to *transferable skills*, as these skills are related more directly to career mobility and resilience in the face of workforce change. Employability skills and transferable skills are, by definition, applicable to a wide range of contexts, and would overcome some of the context-specific issues raised in the Discussion Paper (page 20).

However, while these skills should be included in the framework, their inclusion should not constrain how individual institutions choose to deliver and assess these skills.

#### **4.2 Response**

- **Support a focus on employability or transferable skills rather than enterprise skills**
- **Need to ensure inclusion of those skills does not limit the flexibility of institutions to decide on the best modes of delivery and assessment of those skills.**

#### **4.3 Changes Should be Made to the AQF Taxonomies and Levels**

The ABDC supports removing descriptors for *Knowledge and Skills* from the Qualification Type Descriptors and leaving these just in the Level Descriptor (discussion on page 21). Our only concern is the potential for that to blur the lines between the types of qualifications at a particular level. For example, if *Knowledge and Skills* are only defined at AQF Level 6 then how do we distinguish between an Advanced Diploma and an Associate Degree qualification? The upside of the grey area is that it may improve the relative standing of VET qualifications against Higher Education qualifications at the same level and could improve transferability between Qualification Types. One possible way to distinguish between qualifications could be to define *Application of Knowledge and Skills by Qualification Type* rather than by AQF Level.

The ABDC also supports changes to how VET and Higher Education qualifications are positioned in the AQF so both Qualification Types are valued. The AQF currently implies a hierarchy of qualifications, with VET qualifications occupying lower levels in the framework, and an implication that students move in a linear pathway from lower- to higher-level qualifications. We challenge this assumption, arguing that, increasingly, students are moving back and forth between AQF levels as they seek skills relevant to potential careers. For example, students completing a Bachelor of Business majoring in HRM (AQF Level 7) may go on to complete a Certificate Four in Training and Assessment (AQF Level 4) or a Diploma of Training Design and Development (AQF Level 5) to gain entry level jobs within

this field. We support a system that allows greater complementarity and integration between Qualification Types, and where students may have opportunity to study two Qualification Types in tandem.

### 4.3 Response

- **Support removing descriptors for *Knowledge and Skills* from the Qualification Type**
- **Support changes to how VET and Higher Education qualifications are positioned in the AQF so both Qualification Types are valued**
- **Support a system that allows greater complementarity and integration between Qualification Types, and where students may have opportunity to study two Qualification Types in tandem.**

### 4.5 Decreased Focus on Volume of Learning

The ABDC believes that the focus on the concept of *volume of learning* should be reduced in favour of more focus on outcomes achieved for a Qualification Type. The input-focus on hours of activity does not correspond with the need for a more outcomes-focused education system.

We agree that the current focus on defining *volume of learning* in relation to a typical student is inappropriate, but we also argue that a definition linked to the needs of a *new learner* is also problematic and would not provide clarity. For example, how does the concept of a *new learner* apply in nested qualifications like an Advanced Diploma with nested qualifications at a Certificate and Diploma Level, or a Masters with nested Graduate Diploma and Graduate Certificate? If a student completes the Graduate Certificate component of a Master of Professional Accounting, are they still a *new learner* in the context of accounting?

Using *volume of learning* as a defining characteristic of a Qualification Type is also undermined by the fact that much of the self-directed learning undertaken by students is outside the classroom. For example, many undergraduate business units/subjects have between three and four hours of face-to-face teaching per week or between 36 and 52 hours of face-to-face teaching for a 12- or 13-week semester. However, under the AQF, these units of study would have an expected *volume of learning* of around 150 hours per semester with a full-time semester of study representing a learning volume of 600 hours. With a four-unit subject load this would represent 150 hours per subject. While these volumes are only indicative, there can be no certainty about the true learning volumes being completed by students.

If the *volume of learning* is to remain in the Qualification Descriptors, then the suggested credit point system may be preferable as it is more widely used internationally. This would

be a shift from input-based learning (volume of learning) towards an output-based assurance of learning outcomes.

#### **4.5 Response**

- **Focus of volume learning should be reduced in favour of more focus on outcomes**
- **Do not support changing the descriptor from *average* learner to *new* learner**
- **Support a credit-point system in preference to volume of learning.**

## **Section 5: AQF Policies and Explanations**

### **5.1 AQF Policies**

ABDC supports a pathway policy that accommodates students moving easily between AQF Levels and Qualification Types. It also needs to acknowledge that these pathways no longer run from lowest to highest level as students will move back and forth between Qualification Types and Levels throughout their educational journey. For this to occur students need greater clarity about pathways, including the different entry and exit points into course of study.

#### **5.1 Response**

- **Support pathway policy that allows students to move between AQF levels and Qualification Types**