



Review of the Australian Qualifications Framework

Discussion Paper

DECEMBER 2018

The Australian Qualifications Framework (AQF) Review Panel wishes to draw on the considerable expertise and experience that has developed across a broad range of organisations and individuals in relation to the Review's [Terms of Reference](#).

In its discussion paper, the Panel has opted to provide to organisations and individuals some of the Panel's initial thinking about the case for change to the AQF, but invites differing analysis, conclusions and proposals.

To make a submission to the Review, please email this form to AQFReview@education.gov.au by **15 March 2019**.

Please note that the Australian Government Department of Education and Training will not treat a submission as confidential unless requested that the whole submission, or part of the submission, be treated as such.

Please limit your response to no more than 3000 words.

Respondent name

Australian Council of Graduate Research Inc

Respondent organisation (where relevant)

Australian Council of Graduate Research Inc

1. In what ways is the AQF fit, or not fit, for purpose?

See response to Question 3

2. Where the AQF is not fit for purpose, what reforms should be made to it and what are the most urgent priorities? Please be specific, having regard to the possible approaches suggested in the discussion paper and other approaches.

See response to Question 3

3. In relation to approaches suggested by the Panel or proposed in submissions or through consultations, what are the major implementation issues the Review should consider? Please consider regulatory and other impacts.

The Australian Council of Graduate Research makes the following comments and suggestions in relation to the issues and approaches suggested by the Panel in the Discussion Paper:

The growth, quality assurance and credentialing within the AQF of shorter forms of qualifications

ACGR acknowledges that shorter form credentials are emerging to meet work place training needs and accommodate the range of entry level skills that students have when seeking admission to a program of study.

As the entry pathways to research degrees expand and with the increase proportion of international candidates seeking to undertake research training within the Australian system, there is a greater need for flexibility in higher degree by research admission criteria. Enabling and foundation courses including MOOCs and microcredentials, could provide useful pathways to support preparation for research degrees, particularly for those needing additional support or experience in a particular cognate area or for those who need to broaden their prior methodology skills or add to their prior research experiences.

ACGR agrees that in order for shorter forms of qualifications to be included in the AQF they should be

1. be able to be quality-assured under government approved standards
2. be able to be accredited by an authority authorised under legislation
3. be described according to the AQF descriptions of learning outcomes (knowledge, skills, the application of knowledge and skills and generic learning outcomes)
4. be able to be located at an existing AQF level
5. have clear pathways within the AQF
6. not duplicate an existing AQF qualification type
7. meet a defined industry, professional or community need.

The treatment of enterprise and social skills within in the AQF

The development of enterprise skills within higher degrees by research is a key priority for both the government and the HDR sector. In response to the ACOLA Review of Research Training and in response to a direct accountability set in the Research Training Implementation Plan approved by the Minister of Education and Training, the Australian Council of Graduate Research recently released a set of [Good Practice Guidelines for Transferable Skill Development](#) to support this national agenda.

Within these Guidelines the ACGR makes the following recommendations to universities. Each of these could be strengthened by explicit inclusion in the AQF:

Development

- All HDR candidates have access to transferable skills development;
- Universities clearly articulate the skills expected to be acquired during candidature;
- The importance of skills developed during the process of undertaking a research project are recognised and incorporated;
- Training programs and other models of skills development consider:
 - identifying some mandatory requirements or activities;
 - determining participation thresholds and evidence of participation;

- recognition of prior learning, such as when candidates transfer from another university or have prior professional experience.
- Candidates are explicitly supported to recognise and articulate the skills they have acquired relevant to their career aspirations.

Assessment

- Assessment utilises an approach of evidenced engagement and participation, in preference to prescribed curriculum hours;
- Candidates are provided with support to self-assess their skills and to present themselves competitively for career choices post-graduation;

Recognition

- Achievement is recognised and rewarded in various ways appropriate to the university research training environment, this may include certification, inclusion in the Australian Higher Education Graduation Statement (AHEGS), and micro-credentialing.

Each of these recommendations align with the proposals put forward in the Review Discussion Paper recommending that social and enterprise skills in AQF qualifications should be able to be:

- taught in the context of the qualification's core content
- acquired through the process of teaching and learning
- assessed and reported in ways that are fair, valid and reliable.

ACGR is also supportive of the proposal to expand the list of enterprise and social skills included in the AQF and to provide guidance or advice about delivering them through various qualifications. The Council encourages the Review Panel to include digital literacy in this listing.

But in terms of alignment to specific AQF courses and levels, ACGR points out that research students at AQF Level 9 and 10 students do not undertake these courses to build towards a credentialed course or entry to higher learning but rather to evidence skills development for employability. This learning/skill development is usually bespoke and personalised to each Level 9/10 student and therefore cannot be linked to a generic course learning outcome. And whilst assessment/evidence of learning thresholds and recognition of participation are important, this skill development should not be assessable as part of the attainment of the higher degree by research degree.

Higher degree by research enterprise and social skill development elements of higher degrees by research are essentially foundational to address an employability or graduate outcome skills gap and hence don't need to be and, in fact, often aren't at a level 9/10, so the Council would not like to see skill development anchored in particular AQF levels.

The ACGR also points out the need for alignment of the requirements of the AQF and the expectations of government in respect to skills development. The Department of Education and Training now requires all HEPS to report through HEIMS, HDR student indicators of industry engagement. This raises the questions of the place of this type of learning experience/skill development within the AQF social and enterprise skill framework.

Of continuing and significant concern to the Council is the misalignment between the federal expectation of inclusion of skill development in Level 9 and 10 research training programs and the lack of additional funding to support this. Whilst sectorial need for broader learning for HDR is well recognised, and the current research (outputs) income and HDR completions driven block grants that fund research training provision effectively drive research training efficiency and performance but do not provide for additional social and enterprise skill development provision.

Descriptors duplication

Knowledge, skills and application are currently defined for both qualification levels and qualification types – thus duplicating and confusing the document. The proposal to remove knowledge, skills and application descriptors from the qualification type definitions is acceptable to ACGR.

We also agree that it would be useful to review these descriptors across all levels and ACGR members (ie those with institutional responsibility for research training programs at each Australian university) would be pleased to provide further comment on the Level 9 and 10 descriptors if/as this proceeds.

Volume of Learning Debate

ACGR acknowledges the points made in the discussion paper that defining a typical volume of learning may run counter to the concept that individuals are admitted to degrees with different levels of prior learning and experience and thus need different amounts of time to achieve the required learning outcomes. However this input rather than output view of learning levels is more relevant to coursework programs than research degrees where the outputs (research project and thesis) are individual and not as easily defined or predictable. By its very nature “a new contribution to knowledge” it is more difficult to determine exactly how many hours this will take to achieve.

Quantifying contact or teaching hours is not appropriate for graduate research supervision and a common national hours based credit point system would be problematic for the research components of Level 9 and 10 programs. The Research Training Program Scholarship Guidelines already define typical length of program in years and allow for individual and institutional flexibility in the volume of learning/length of PhD and masters by research programs as defined in effective full time years and this is a better way to consider volume of learning in research degrees.

There are some concerns with the proposal to base volume of learning on “new learners” rather than “typical” learners and then potentially decrease the time available based on prior learning or experience. Adoption of this model in the graduate research space may have unintended consequences where the output is not only the capabilities of the candidate but also the production of the thesis. Rather, ACGR believes that the volume of learning should be set at the minimum required for the completion of a doctoral level research thesis by a candidate admitted with all pre-requisite research experience and expertise. The AQF could provide the opportunity to increase this volume for those who need foundational research skill or cognate knowledge development to support their particular project or prior learning or experience.

Other

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