

## **Australian Qualifications Framework – Discussion Paper, May 2009**

### **ACTU Submission**

The ACTU welcomes the discussion paper released by the Australian Qualifications Framework Council.

The ACTU makes the following brief comments in response to that paper. In doing so we do not respond to each of the question posed but rather provide a higher level consideration of the underpinning issues. We look forward to ongoing discussion with the AQFC as the proposals for the future of the AQF develop.

In general the ACTU is however concerned at the approach taken in the discussion paper to the question of the AQF and how it is best structured. The discussion paper presupposes the primacy of a university based outcomes and fails to recognise the role of VET qualifications in terms of their relationship to work. The paper also fails to recognise – and hence develop proposals that recognise – the importance of the attainment of competency and how this is obtained in the VET sector. Hence the discussion on credit systems falls back to a need to measure ‘volume’ and not recognise the outcome of the VET qualification in terms of skills and knowledge in the workplace.

#### **General**

The ACTU submits that a qualifications framework must meet a number of key objectives. In doing so they must, of course, remain fit for the purpose for which they were developed. This has particular resonance in the VET sector where any outcome of a review of the existing qualifications framework must recognise the inherent relationship between qualifications outcomes (particularly though not exclusively) in the VET sector. The relationship between vocational qualifications and work cannot be ignored in any review of the AQF.

These objectives include:

- Provide a link between training outcomes and occupations;
- Clear and unambiguous;
- Institutionally neutral;
- Be reliable, easy to use and easy to understand;
- Be accessible; and
- Assist employers and employees understanding of what a qualification at level means in practice.

### **Alignment of the objectives of AQF around policy goals**

The ACTU does not support the alignment of the objectives of the AQF around policy goals.

Policy goals will change as outcomes are achieved, the economy changes, priorities and government change. To align the objectives of the AQF around policy goals would result in a qualifications framework under constant review and change. Such an outcome will not be of use to employers, employees or students undertaking study. This is not to suggest that policy goals are not a legitimate input into the qualifications but the qualifications need to withstand changes in those policy goals.

The objectives of the AQF must be robust enough to withstand changes in policy goals. This is not to suggest that the policy goals are not an important input to the objectives but they should be one of a number of inputs only.

### **A framework based on a taxonomy of learning outcomes with reference to levels...**

The ACTU is not opposed to the development of a framework based on a taxonomy of learning outcomes as long as the 'learning outcomes' are not too narrowly defined and the competence and skill aspects of the taxonomy are given due weighting. That is, we would be disappointed if such an approach

did not find the appropriate balance between knowledge, skills and competence.

The benefit of a single taxonomy however will provide a greater degree of coherence within the qualifications framework and this is, in our view, a critically desired outcome.

In terms of the preference for the 'merging' of context and generic competencies or their separation into two distinct dimensions, the ACTU has a strong preference for the 'merging' option. In our view this better allows for a contextual setting of the generic skills.

### **...with a measurement of the volume of learning**

The question of 'volume' of learning has a range of issues associated with it.

Volume has for a long time been a critical issue in the VET sector, particularly as it relates to articulation into a university sector that uses volume as an important input. Attempts to develop coherent systems that better enable articulation between university and VET sectors has not been without its difficulties in the past.

Volume has an even greater import in the VET sector as it is often associated with funding (SCH) or is used as a political tool (to reduce apprenticeship periods from 4 to 3 years). 'Volume' as such is also not uniform across the states (again often due to political considerations). The subsequent capacity to nominate notional student learning time (proposal 2C) is fraught, in our submission, with dangers. Such a determination may well be used for purposes not intended.

In addition the ACTU is concerned that a 'volume' based approach will undervalue what is achieved through a VET qualification in relation to competence and occupational outcomes.

Whilst the ACTU appreciates the need to create a 'common language' across all institutions for the purpose of facilitating, where sought, articulation the risk of an approach that relies so heavily on volume must be acknowledged. Alternate systems should be explored.

Care needs to be taken that the drivers of articulation in the AQF do not become the reason for the AQF. Again this goes to the need to recognise the purpose of the AQF (its purpose is not to facilitate articulation from VET to university) and to not undermine this purpose. This is not to say there may not be complementary purposes but the *primary* purpose should not be undermined.

Should measures be developed for articulation purposes (not necessarily a volume measure), the ACTU would seek to see that the activities (see page 22) that might form an input to those measures adequately reflect on the job aspects of training, methods of delivery and competency assessment that are so critical in the VET sector.

### **Reference levels**

The ACTU does not oppose the use of qualifications being organised around an explicit reference levels-based structure as long as such an approach does not disturb the *industrial* relationship between qualifications outcomes in the VET sector and occupations. Such an approach could enable the criteria set out in the introduction to this response to be met in part.

### **Credit arrangements**

The ACTU supports the development of better articulation pathways between post secondary sectors. The development of those arrangements must however recognise the structure of VET qualifications – that is that you do not do a Cert II as a pre-requisite for a Cert III – unlike university where you start with a bachelor degree then move to masters, then PhD.

That is, any credit system must recognise the diversity of pathways within the VET qualifications space.

Again however, the ACTU is concerned that the need for a credit system does not become the driver of the review of the AQF for all the reasons outlined above.