



Australian College of Nursing

REVIEW OF AUSTRALIAN QUALIFICATIONS FRAMEWORK

AUSTRALIAN COLLEGE OF NURSING (ACN) FEEDBACK FOR REVIEW OF AUSTRALIAN QUALIFICATIONS FRAMEWORK (AQF)

General Comment

The Australian College of Nursing (ACN) welcomes the opportunity to provide comments on the review of the Australian Qualifications Framework (AQF) by the Australian Government Department of Education and Training. As the pre-eminent and national leader of the nursing profession, ACN is committed to advancing nurse leadership and education to enhance the health care of all Australians.

ACN is supportive of this review, as the last review was conducted between 2009–2011. Since then, many changes, particularly in the health industry have occurred due to technological advances, as well as changing needs of Australian people. By providing this submission, ACN hopes to aid the review to ensure that the framework continues to meet the needs of students, employers, education providers and the wider community.

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

The Australian Qualification Framework (AQF) has been an education industry stalwart for over 20 years. Since its inception, the AQF system has enjoyed a revered international reputation, with many countries wanting to adapt the format. However, there has been little change since its introduction.

Education needs are no longer accommodated within the current AQF and it could be considered as no longer fit for purpose, as the emerging learner no longer wants to undertake a qualification that is inflexible and restricts the study areas they can choose. With the ever-changing world of technology and external environmental factors that influence industry, a learner needs to have a flexible education system that can meet their educational needs to accommodate these changes. Two individuals studying the same course could have different learning needs based on their industry and job role.

The current AQF does not have sufficient capacity to apportion a rating to micro-credentials and short form credentials, differentiate between providers, or between qualifications within AQF levels (For example Bachelor's Honours, Graduate Certificate or Graduate Diploma). Further, statements of attainment issued in the VET sector may not demonstrate a specific AQF level following the changes to the unit of competency code format.

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.

Determining priorities is challenging as responses from other participants may identify priorities that are more urgent. Before setting priorities, consideration would need to be given to the regulatory impacts and whether the proposed changes can work in the current regulatory system.

Having one regulatory framework (amalgamating ASQA and TEQSA) would assist with implementing the AQF qualifications pathway into any new framework. There are already considerable similarities with regulations and standards and to combine both would seem both reasonable and practical.

Micro-credentials, Skill Sets and Supplementary courses

The inclusion of micro-credentials, skill sets and supplementary courses should be prioritised. The VET system already has skill sets; however, these skill sets stipulated, are not flexible and some are not fit for purpose and ACN recommends that these should be reviewed. For example, Assistants in Nursing (AIN) and Enrolled Nurses (EN) are educated predominantly through the VET and RTO sectors, whereas Registered Nurses (RN) are educated in the Tertiary sector. Additionally, AINs, ENs and RNs may possess evidence of partial completion of a course (e.g. single postgraduate unit of study) and/or complete short courses for continuing professional education. These should be assigned an AQF level to clarify articulation pathways. If CPDs were assigned an AQF rating, it would clarify the extent to which this could be attributed towards a higher degree.

The suggested horizontal AQF listed in the document "Other Countries – Shorter Form Credentials in Qualifications Frameworks", includes micro-credentials, skill sets and supplementary courses and is virtually the same as the NZ framework. A question that arises here is whether the NZ framework is the benchmark, or should the AQF be benchmarked against what is considered the global leader?

Further, will micro-credentials need to be approved by the regulator, or will education providers be able to offer these as long as they fit within the qualification that is on their scope of registration – similar to skill sets in the VET sector?

The requirement to go through an approval process for micro-credentials if you already have the qualification registered, will affect the resources of both the provider and the regulator. In light of this, will education providers be able to add micro-credentials to their scope of registration without having the qualification already registered?

Volume of learning (VOL)

ACN proposes that VOL should still be included in the new AQF and be adaptable to micro-credentials. It is a vastly misunderstood, misinterpreted and misused area within the AQF. The VET regulator use of VOL to regulate their industry can often times be applied unfairly, which creates further confusion within the sector.

Credit Pathways

An important concern is the interpretation of qualifications at the same level but not recognised as such between the VET and Higher Education sectors unless there is an articulation agreement in place between parties. For example, Advanced Diploma in VET is not perceived by universities as being at the same level as their Associate degree. Similarly, universities do not agree that a vocational graduate diploma is the same as a graduate diploma, with regards to the Level 8 qualifications.

Universities have a right to protect the integrity of their qualification; however, articulation agreements restrict the learner's opportunities to select a university of their choice. The push back from universities not recognising qualifications from the VET sector has been occurring for years and prior to the recent VET issues that have surfaced with unscrupulous providers. Unless the AQF qualification pathway is legislated, it is not expected that change will occur between sectors.

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.

Concerning approaches suggested by the panel, ACN has a few comments as follows:

- All courses must be assigned an AQF level. Greater differentiation between levels must occur to reflect varying levels of complexity. This may reduce duplication and allow the governance and accreditation process to be more transparent and efficient.
- AQF is currently delivered through the Australian Government Department of Education and Training (DET), in consultation with the states and territories. DET monitors and maintains the AQF, supporting its users. The capacity exists for recognition of international developments, extended application of AQF levels and a streamlined national approach, to regulation, implementation and governance.
- There needs to be a greater differentiation in the level descriptors within each AQF level or more levels. For example, Scotland has 12 qualification levels with a five-tier descriptor. This allows more clarity and more scope to encompass micro-credentials/short course.

- Concerning changes to training packages in the VET system, considerable restructure and redevelopment would need to occur to accommodate micro-credentials. Is there still a place for training packages in the new AQF? The current process of development creates confusion and significant non-compliances.
- There needs to be consideration on the impact on education providers, and the regulators ASQA and TEQSA, should changes to scope need to occur. There would be increases in cost and staffing to implement any changes to the AQF.

4) Other Comments

Recently an Australian university launched a campaign advertising bespoke courses, which offer the learner the opportunity to choose the units that best suit their current and future career pathways. This makes education more attractive and learners may likely be more open to undertaking study that will have value to them. Clarification is needed to confirm whether these types of courses would fit into the proposed AQF framework identified in 'Other Countries – Shorter Form Credentials in Qualifications Frameworks'.