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Dear Ms Doolette

Australian Qualifications Framework Council's consultation on strengthening the AQF

Thank you for this opportunity to comment on the Australian Qualifications Framework Council's consultation paper on strengthening the AQF. Griffith University supports the Australian Government's policy to strengthen the Australian Qualifications Framework and looks forward to working with the council and other institutions on the strengthened framework.

Objectives - authorising providers to issue nationally recognised qualifications

Griffith agrees with the council's discussion of the desirability of strengthening the AQF's objectives, and in particular agrees that the framework should be the tool for authorising providers to deliver and issue nationally recognised qualifications. Currently the framework does this indirectly, most importantly for universities and other self accrediting institutions via the Commonwealth's register of institutions and courses for overseas students. It would be better if this were done consistently for all nationally recognised qualifications offered by all institutions to all students.

The council might consider whether this objective should extend to Australian institutions' programs offered off shore. For some international students it may be sufficient for the qualification to be recognised in the home country, but for students contemplating immigrating to Australia it may be important for them to undertake a program recognised in Australia.

Objectives - recognising students' learning and facilitating their progression

Griffith supports the recognition of students' learning and experience and the facilitation of their progression and mobility through education and work. This depends heavily on the nature and strength of the monitoring of educational standards, which currently neither has the appropriate approach nor the necessary rigour to improve the recognition of students learning and the facilitation of their progression through education.

Some students' selection into programs with competitive entry is limited by their results being reported as pass/fail rather than on a scale with multiple grades. While some competence-based assessment is now reported in multiple grades, progress has been slow and patchy.

Learning outcomes - general competences

Griffith supports the adoption of the knowledge, skills and competence taxonomy of learning outcomes but sees no point in including general competences, often called generic competences. The claims for general competences are vastly overstated (Young and Allais, 2009: 9). They seem plausible when made in the abstract but soon collapse when concrete examples are considered. For example, problem solving in physics is quite different from problem solving in law which are different again from a counsellor's problem solving. To refer to the same capability the competence either has to be stated so generally as to be meaningless or has to be specified so closely as to be no longer general.

Levels - (post) graduate coursework qualifications

Griffith strongly supports levels being made explicit in the Australian qualifications framework. As Karmel (2008: 4) observes, if the Australian Qualifications Advisory Board had been consistent in its insistence that the framework has no levels it would not have formatted the table shown in table 1 of the discussion paper to align qualifications in each sector to indicate their being at a similar level. Karmel's depiction of the Australian qualifications framework truly free of levels is shown in table 1.

Table 1: the Australian qualifications framework truly free of levels

School sector	Vocational education and training sector	Higher education sector
Secondary certificate	Graduate vocational diplomas Graduate vocational certificates Advanced diplomas Diplomas Certificate IV Certificate III Certificate II Certificate I	Doctoral degree Masters degree Graduate diploma Graduate certificate Bachelors degree Associate degree Advanced diploma Diploma

Source: Karmel (2008: 4) Box 1: the Australian qualification framework.

There is no need to accommodate further complexity at this stage of the strengthening of the qualifications framework, but at some stage account will need to be taken of the different types of (post) graduate coursework programs. Some graduate certificates, diplomas and masters programs are at bachelor level with perhaps a somewhat different orientation or assessment. The Department of Education, Employment and Workplace Relations (2008) records these 'horizontal' graduate programs as 'graduate diploma/ postgraduate diploma (pass or honours) involving new academic, professional or vocational area'. Other 'vertical' graduate certificates, diplomas and masters programs build on a baccalaureate in the same field to develop more advanced knowledge, described by the department as 'extending skills and knowledge in a professional area previously studied'. The popularity of graduate entry medical and other high demand programs is likely to result in the continued expansion of graduate certificates, diplomas and masters that are at baccalaureate level.

Both the 8-level and 10-level examples provided in table 7 of the discussion paper show graduate certificates and diplomas at a higher level than baccalaureates. If either of these examples were implemented either the 'horizontal' graduate certificates, diplomas and masters would have to be phased out, or a different type of graduate certificate, diploma and masters would have to be shown at the same level as baccalaureates.

Unit of volume of learning - EFT, consistency with Bologna

Griffith strongly supports the inclusion of a measure of the volume of learning in the Australian qualifications framework. While credit points are often used to record volume of learning, a more direct unit of learning volume is equivalent full time study load, the study load undertaken by a normal student in a specified program in a specified institution. Griffith would therefore prefer the unit of learning to be 1.0 equivalent full time study load, with units to 1 decimal place if the discussion paper's decimal measure is adopted. If this proposal were adopted a baccalaureate would be at least 3.0 eft.

The Bologna accord and indeed the current Australian qualifications framework specify that a masters is normally 2 years equivalent full time after a pass bachelor's degree, or 200 points in the discussion paper's units. This raises difficult issues for Australian universities' competition for international students because UK masters also do not comply with the Bologna accord (to which the UK was an original signatory) in being 1 eft. Griffith suggests that this be reviewed separately, perhaps with officials from the UK and the Bologna process secretariat, and a transition planned for whatever masters length Australia adopts.

Associate degrees are 2 years in Canada and the US, English foundation degrees are 2 years (Hefce, 2008) and Griffith understands that many if not most Australian associate degrees are 2 years' equivalent full time. Griffith therefore submits that associate degrees should be shown as at least 200 points in the discussion paper's table 9. There are many standard 4 year as well as 3 year baccalaureates so Griffith would show baccalaureates as 300 - 400 points.

Single register

Griffith agrees with the council's observations about the devolved registers of qualifications and providers and supports the establishment of a single national register.

Collapsing the sectoral columns in table 1

The discussion paper implies but does not state explicitly that the columns in the discussion paper's table 1 showing 3 sectors of accreditation would be collapsed into 1 column. Griffith submits that this should be done and should be made explicit. Simplifying the table in this way would not, of course, preclude there being different accreditation criteria, processes or bodies for different types of qualifications.

I look forward to the council's further work on this project.

Yours sincerely

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