

**Australian Technology Network of Universities (ATN) response to
*Strengthening the AQF: a framework for Australia's qualifications***

As a group of universities committed to the improvement of the national post-compulsory education agenda, the Australian Technology Network of Universities (ATN) welcomes the opportunity to respond to the Australian Qualifications Framework (AQF) consultation paper '*Strengthening the AQF: a framework for Australia's qualifications*'.

The ATN reiterates its support for the review of the AQF and its role to ensure it reflects and promotes the best outcomes for Australian post-compulsory education. It is important for the Framework to continuously develop to take account of both national and international developments that may affect best practice.

This submission will address certain key issues identified by the paper relating to the comprehensiveness of the policies, other policy aspects that should be considered and implementation, noting that individual ATN members have specific views on issues raised in the paper and may make their own more detailed submissions.

The ATN strongly supports the inclusion of generic skills, which we consider particularly important to making qualifications more relevant and meaningful both for the recipient and for their employers. As a Network, we have a renowned history in developing and applying explicit strategy to embed relevant generic capabilities in courses in which students are enrolled. With a commitment to providing high quality professional and vocational education, research oriented towards the needs of industry and the community, and a genuine focus on international education, the ATN has long recognised the benefits of generic skills - better learning and employability. The development of the ATN Graduate Capability Statement (refer attached) attests ATN commitment to embedding *generic* capability across its programs ensuring our students graduate with a transferable level of capability, not simply a checklist that satisfies a specific profession. The success of this strategy culminated in its broadening beyond undergraduate levels to the highly successful Graduate Certificate in Research Commercialisation which specifically addresses employability skills. The

program (with its genesis in the award winning LEAP programme) gives individual PhD graduates more confidence to apply their research in the workplace. We are therefore pleased to see generic skills explicitly defined in the proposed framework and that “application” has replaced “competence” as the third dimension of learning outcome.

However, the ATN draws the Council’s attention to a number of policy aspects that are lacking clarity in the consultation paper.

Comparison to international frameworks is supported. However, evidence is lacking that the revised AQF is robust in international contexts. In regards to the proposal as a whole, the ATN would seek further clarification about the interaction between this framework to strengthen the AQF, and its relationship to international frameworks. While we understand that there has been reference to international approaches during its development, it would make sense that the AQF was tested against international frameworks before final approval and implementation. **The ATN recommends that the AQF undertake testing against international frameworks that provides the sector with confidence as to its robustness in international contexts PRIOR to approval and implementation.**

While we agree with the direction and intent, the ATN is concerned that the AQF is becoming too prescriptive. Issues such as restrictions on naming of degrees, the sector wide imposition of minimum credit transfer levels for both discipline related and non-discipline related diplomas and the requirement for an AQF statement, and potentially a logo, to be put in all testamurs are matters that impinge on university autonomy. **The ATN strongly opposes the inclusion in the Framework mandating naming of degrees.** Further as self accrediting bodies, **the ATN opposes the inclusion of the AQF logo on graduation statements issued by universities.** Finally, the ATN believes it unnecessary for the AQF to mandate credit transfer. Universities have policies and processes in place that allow for appropriate credit transfer.

In order to fully realise its potential, Australia needs a comprehensive system of education which recognises the different roles played by higher education, VET and the adult education sector, but which positions them as part of a national network of post-compulsory institutions. We believe that

there must be clarity within the sector on how such a system can be best achieved. In regards to the proposal as a whole, the ATN seeks further clarification about the interaction between this proposal to strengthen the AQF, and the establishment of the Tertiary Education Quality and Standards Agency (TEQSA). We recognise the legislative barriers to a single entity incorporating the AQFC within TEQSA. However we seek assurance that TEQSA and the AQFC do not develop rival agendas and that both bodies consistently support innovation, flexibility and international comparability of educational offerings. The development of an AQF and the mandating of compliance through TEQSA will not reflect these principles and will be in conflict with the stated aim of allowing universities greater flexibility and responsibility for their awards. A solution to guard against this would be AQF Council representation on the TEQSA Board. **The ATN recommends that the AQFC provide clarification about the interaction of the revised AQF and the Tertiary Education Quality and Standards Agency (TEQSA).**

The ATN looks forward to working with the Australian Qualifications Framework Council as it continues its development of a robust AQF that supports a quality higher education sector both domestically and internationally.

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