

**SUBMISSION TO THE AUSTRALIAN QUALIFICATIONS FRAMEWORK  
STRENGTHENING THE AQF  
August 2010**

**Background to Community Colleges Australia**

Community Colleges Australia (CCA) is a member-funded peak body. It was formed in late 2006, recognising a need for an industry association at a national level to represent not-for-profit (NFP) community owned providers of adult and youth education, training and learning in a local environment. It currently has 65 members representing over 60% of the VET delivery by NFP providers in the eastern states of Australia, with the view that this will extend to the other states and territories over the next 3-5 years.

The members of CCA are adult and community education registered training organisations, dispersed throughout metropolitan, regional and rural locations. Individually, members deliver a diverse range of funded and fee for service programs and projects at a federal, state and local government level, covering economic and skills development (such as Vocational Education and Training, employment services, employment programs, Traineeships, small business programs), community development and social inclusion (such as sport and recreation, community partnership programs, volunteer programs) and health services, including programs for aged care and disability.

The 'Community Colleges' have a commitment to providing a range of accessible pathways to suit different learning needs, and to assisting individuals achieve successful personal development and employment outcomes. This commitment has enabled our members to offer qualifications to a broad demographic, including the most socially excluded, and into new markets such as delivery of higher qualifications, to international students, and off-shore.

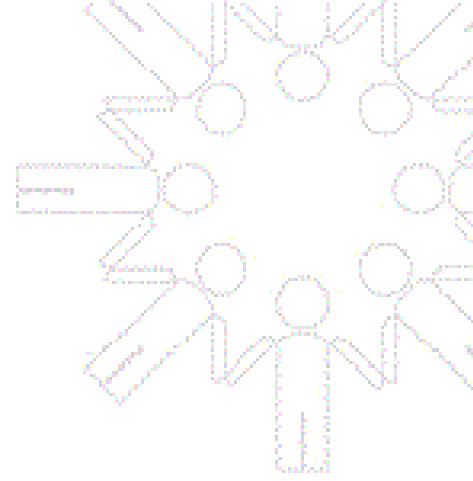
CCA is committed to assisting members grow their business and thereby to enhance the learning opportunities for all Australians through all stages of their adult lives. CCA promotes 'real education for today's Australians' by delivery that engages and belongs to local communities.

Our vision is for Australia to achieve more dynamic and vibrant communities, informed and empowered through learning.

Community Colleges Australia appreciates the opportunity to provide a response to the *Strengthening the AQF* consultation process. CCA supports well considered measures that ensure the quality of qualifications for our communities, students, local employers and industry partners.

**Response to the Consultation Paper**

A strengthened AQF can only work if there is consistency in how it is regulated. While we recognise that the AQF policies are generic in nature so that individual state regulatory bodies can manage the detail according to state policy, CCA supports a high level of consistency in auditing, feedback and monitoring not only between sectors, but also between states. We are



looking forward to hearing more of the Tertiary Education Quality Standards Agency, and the National Regulator.

### **1. Generic Skills Policy**

Community Colleges are committed to lifelong learning, and providing socially inclusive learning opportunities for our communities. In this regard we recognize that ‘generic skills’ are a corner stone to our delivery, and welcome the inclusion of a policy that relates specifically to this.

CCA believes that Language, Literacy and Numeracy (LLN) skills provide the foundation for generic skills development, and should therefore be more explicit throughout all AQF Levels criteria, particularly levels 1-3. Currently there is a specific link to LLN capability in the ‘Skills’ area of the Qualification Type descriptor for the Senior Secondary Certificate in Education. We feel it is crucial that a more specific reference to LLN in the Qualification Type descriptor in the other Level 3 and lower qualifications be included.

### **2. AQF Qualifications Issuance Policy**

CCA is generally in support of the Issuance Policy. However as previously mentioned we believe that there needs to be greater standardisation between regulatory bodies. A strengthened AQF can only be successful if there is consistency in the way it is regulated. With the move to TEQSA, and New National Regulator we hope to see much greater consistency across states, and between higher education sectors.

We have some concern that the language of 2.2.4 implies that replacement of testamur may be at no cost; however, it is standard practice in Community Colleges to charge an administration fee for replacement documents.

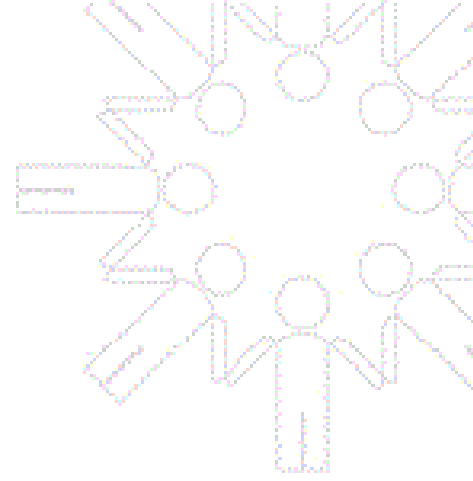
We await comment from the National VET Data Strategy Action Group on the subject of the National Unique Student Identifier.

### **3. AQF Qualifications Pathways and Linkages Policy**

We support the Pathways and Linkages Policy as we recognize that it is vital for students to be able to access seamless pathways between qualifications.

Something to consider in relation to this policy is the funding models that support VET in various sectors and states. For example, the creation of ‘systemic and systematic pathways’ and ‘increased flexibility of qualification pathways’ in Victoria can be hampered by the different sources of funding that may be contributing to a student’s pathway. CCA advocates that the AQF Council consider other policies which may make the implementation of the Pathways and Linkages Policy problematic.

Similarly, we applaud the increased recognition of learning that occurs in everyday life; however, the funding models must support this in a way that encourages RTOs to undertake the recognition process without being financially disadvantaged.



#### **4. AQF Register Policy**

As an organisation representing members working in different states, CCA supports the establishment of a single national register.

In addition to different states, Community Colleges are also moving to work in different sectors to meet community needs; for example several of our colleges are now delivering Senior Secondary Certificate in Education qualifications. Currently our members appear on a number of education related databases, including NTIS, NSW Board of Studies, and Victorian Registration and Qualifications Authority. A single national register would provide one point of reference for any organisation delivering education and training at any level.

#### **5. Glossary of Terminology**

In pursuit of standardisation and consistency CCA supports the Glossary of Terminology. Our experience suggests that even in the community education sector there is sometimes confusion due to differences in terminology between states

We would be happy to discuss our response with you in more detail if required.

Yours sincerely

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