



12 October 2010

Geoff Wilson MP  
Minister for Education and Training  
PO Box 15033,  
CITY EAST QLD, 4002

Dear Minister

Re: AQF alignment of Senior Secondary Certificate and Level 3

As Queensland's peak business organisation, the Chamber of Commerce and Industry Queensland (CCIQ) wishes to express its concern over moves to reform the Australian Qualifications Framework (AQF) to align the educational outcome of the Senior Secondary Certificate with AQF level 3. CCIQ believes that the proposed alignment of the Senior Secondary Certificate at AQF level 3 could lead to artificial inflation of the qualification's award rate beyond the actual complexity and volume of learning that they entail.

While CCIQ recognises that some students undertaking a senior secondary certificate are engaged in individual subjects or units that may be up to first year undergraduate levels, the Chamber firmly believes that it is inappropriate to align the Senior Secondary Certificate with qualification levels that demand a strong demonstrated knowledge and skills component such as AQF level 3.

Students undertaking the Senior Secondary Certificate may complete a broad range of subjects which are aligned at a variety of levels through VET in Schools (VETiS), Australian School Based Apprenticeships (ASBAs) and higher education subject offerings. It is, however, a rare occurrence for a student to complete a full qualification at Certificate 3 level or above. NCVER<sup>1</sup> data from 2007 shows that less than 20% subjects or Units of Competency undertaken in VETiS or ASBAs by students are at AQF level 3 or higher. Additionally, 92% of VETiS & ASBA full qualification completions were at AQF 1 and 2, leaving very low numbers of completions in higher level qualifications.

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<sup>1</sup>NCVER, VET in Schools 2008, <http://www.ncver.edu.au/vetsystem/publications/2230.html>



CCIQ believes that there is the possibility of industry dissatisfaction and disengagement from formal training if school graduates are perceived as having a Cert 3 equivalent qualification but cannot perform at the required level in the workplace. The strength of the Australian VET system is based heavily on the expectation of workplace outcomes in training. Training, especially at the recognised industry entry points of AQF 2 and 3 is directed ultimately towards achieving skills specific to the requirements of industry. Dilution of the qualification outcomes by aligning a qualification outcome with little or no vocational specific skills or knowledge would be detrimental to the national VET system and have a significant effect on the skills base available to Queensland business and industry.

The preferred model of CCIQ and the Australian Chamber of Commerce and Industry would see the Senior Secondary Certificate occupy a separate stream to the current suite of AQF qualification levels that does not give the impression of equivalency to a trade or occupation specific qualification type aligned at AQF level 2 or 3. CCIQ recognises that VETiS and ASBAs play a considerable role in forming the senior secondary studies of many students; however due to the different nature of school curriculum and Training Package qualifications developed by industry, there is a need to separate the two to avoid the implication of equivalency.

This separation of the Senior Secondary Certificate from the mainstream AQF levels would allow the recognition of the broad subject base of the Senior Secondary Certificate and the complexities of the varying VETiS units, higher education subjects and general curriculum subjects combined to make up the range of offerings to senior secondary students.

CCIQ believes that the focus of the AQF must ensure the integrity of the learning outcomes for industry and individuals rather than meeting the delivery and curriculum requirements of universities, training providers and schools, and educational attainment targets of government.

If you would like to discuss this matter further, please do not hesitate to contact me or Elizabeth Roberts, Education and Training Advisor on (07) 3842 2227.

Yours Sincerely



Nick Behrens  
General Manager, Policy