



AQF COUNCIL

Graduate and Vocational Graduate Certificates and Diplomas in the Australian Qualifications Framework

Joint response from TAFE Directors Australia and Victorian TAFE Association

Introduction

TAFE Directors Australia (TDA) represents 61 Australian TAFE providers. The Victorian TAFE Association (VTA) represents 14 TAFE Institutes and 4 multi-sector universities. Our members deliver training and education across the spectrum of the Australian Qualifications Framework (AQF) including Senior Secondary School Certificates of Education, Vocational Certificates, Diplomas, Advanced Diplomas, Associate Degrees, Bachelor degrees and postgraduate qualifications.

TDA and VTA are pleased to be able to further comment on the place of graduate and vocational graduate certificates and diplomas in the Australian Qualifications Framework. TDA and VTA members may also respond individually to the discussion paper to highlight areas of particular interest to their organisations.

Response to Future Qualification Types

We wholeheartedly support the AQF Council intention to remove the term *Vocational* from any of the qualifications' nomenclature in the Australian Qualifications Framework. The application of knowledge and skills to both a discipline and professional areas will ensure both vocational and academic outcomes will be catered for.

We also fully support the AQF Council intention that both the vocational education and training sector and the higher education sector will be able to accredit and issue qualifications at levels 7 and 8.

However, the decision of the AQF Council to propose changes to introduce two new qualification descriptors (Graduate Diploma and Graduate Advanced Diploma) to replace existing Graduate Certificate (GC), Graduate Diploma (GD), Vocational Graduate Certificate (VGC) and Vocational Graduate Diploma (VGD) qualifications types has met with mixed responses from our members. GCs have been a feature of Australia's qualifications system for decades and the terminology is universally understood in education circles. The proposed changes to no longer have a GC, to redescribe a GD and introduce a Graduate Advanced Diploma (GAD) came as a surprise to stakeholders with an interest in the current review, particularly as the options in the first consultation paper Review of Graduate and Vocational Graduate Certificates and Diplomas in the Australian Qualifications Framework did not elude to this nomenclature in the AQF. We note the argument presented in the consultation paper Graduate and Vocational Graduate Certificates and Diplomas in the Australian Qualifications Framework that the proposed changes use nomenclature that resembles the language used at level 5 and level 6: Diploma and Advanced Diploma. Equally, the language of the AQF includes use of the term certificate. We are not advocating that the status quo

be retained, but consistency in the already established pattern in the AQF could also be achieved by having a GC (level 7) followed by a GD (level 8) in much the same way as diplomas follow certificates in the AQF. This structure will meet the requirement of having intermediary, clearly differentiated qualification types at two levels with the flexibility for both broadening and deepening qualifications.

Recommendation 1: The AQF Council reconsider the decision to take the GC nomenclature out of the AQF.

Volume of learning

The proposed change to include a new level 7 graduate qualification in the AQF with a volume of learning of 1-2 years generated considerable negative reactions from TDA and VTA members. This negativity stemmed from the deletion of any qualification with a volume of learning less than 1 year as an exit point. We note that the current consultation paper (page 4) states that 'a Graduate Certificate of short duration is not sufficiently robust as a stand alone qualification and that a qualification with a greater volume of learning better reflects the value of a qualification type at this level and for its stated purpose.' Yet, no evidence is offered in the consultation paper to substantiate this statement. Current GC qualifications with a volume of 0.5 years are as rigorous as any other qualifications in the AQF.

In our members' experience, GC, GD, VGC and VGD qualifications provided through the TAFE sector are typically undertaken by mature aged workers with significant industry experience, without a recent experience of study and seeking to acquire new high level skills relevant to workplace situations. A graduate qualification with a volume of learning of 0.5 years is a feasible duration and is ideally suited to this cohort while still achieving the purpose of qualification type at level 7.

Recommendation 2: That the volume of learning for the level 7 graduate qualification is changed to 0.5 - 2 years.

Recommendation 3: The AQF Council validate industry needs in these matters before making a final decision on the volume of learning of a level 7 graduate qualification.

Transition & Implementation Arrangements

We agree that, consistent with current transition arrangements for the revised AQF, further changes to the AQF as a result of this review will require that new enrolments meet the AQF by January 1, 2015. We believe this review is also a timely opportunity for the AQF Council to take a leadership role for the removal of qualification names on offer that do not comply with the AQF, for example, *Postgraduate Diploma* by I January 2015. However, with only five months remaining in 2012, and with many providers already proceeding with accreditation plans for GC, GD, VGD and VGC, the introduction date of 1 January 2013 for any changes as a result of these current deliberations by the AQF Council, appears unrealistic. Self-accrediting providers may be better placed to action 1 January 2013 date but providers using TEQSA, ASQA or state based regulators may not be able to achieve this introductory date with existing work demands of the regulators. We request that AQF Council consults with TEQSA, ASQA and VRQA on the appropriate date to introduction of new qualification types.

Recommendation 4: That the introduction of new qualification types, as a result of this review of the place of GC, GD, VGC and VGD qualifications in the AQF, takes effect from 1 July 2013.

Our members are most concerned that changes to the AQF, shifting the qualification type *graduate diploma* from a level 8 to a level 7, could create barriers to further academic pathways for holders of existing GC, GD, VGC and VGD qualifications. For example, in 2012 a person enrols in a GD with a clear understanding of the relationship of this qualification (level 8) to achieving a masters degree in the future in terms of recognition/credits. The person completes the qualification in 2013 but does not continue immediately to studies at the masters degree level. If the GD graduate applies to enter a masters degree after 1 January 2015, what will be the status of the currently held qualification?

We note the consultation paper states mapping of these existing qualification types against the new qualification types to show equivalence for graduates of the former qualification types in the future. No graduates in of existing GC, GD, VGC, VGD qualifications can be unfairly disadvantaged as a result of the proposed changes to the AQF. The AQF 2011 Pathways Policy needs to provide guidance to users on pathways into and from any newly designed qualification types and, from old qualification types to new qualification types. For example:

- granting of credit for graduates of VGC or GC (level 8) against an Advanced Graduate Diploma,
- granting of credit for graduates of new Graduate Diploma (level 7) against a Bachelor degree, or
- the relationship between an existing GD/VGD and a new Advanced Graduate Diploma.

In relation to pathways, we request that any further representation of qualification pathways like those contained in the examples on pages 6 and 7 of the consultation paper, include Diploma and Associate Degree qualification types. From a VET perspective, Diploma qualifications coupled with extensive relevant work experience are often the preferred entry to level 7 and 8 qualifications. It would be remiss to focus on the traditional higher education pathways to lifelong learning as appears to be the case in the current representations.

Recommendation 5: The AQF Pathways Policy is revised to accommodate new qualification types and to provide guidance to users on pathways and credit arrangements under a revised AQF 2011.

Key Contacts:

Pam Caven
Director Stakeholder Engagement
TAFE Directors Australia
pcaven@tda.edu.au

Nita Schultz Education Policy Consultant Victorian TAFE Association nschultz@vta.vic.edu.au

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