AQF Council Proposal for the Graduate and Vocational Graduate Certificates and Diplomas in the AQF

ACPET submission

June 2012
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About ACPET

Established in 1992, the Australian Council for Private Education and Training (ACPET) is the national industry association for private providers of post-compulsory education and training. ACPET has over 1,100 members nationally delivering a full range of higher education, and vocational education and training (VET), including apprenticeships and traineeships, and English language courses across all States and Territories. ACPET has approximately 100 members delivering higher education throughout all Australian states.

As the peak body for private providers, ACPET is committed to ensuring that its policies, products and services contribute to an inclusive tertiary education system.

ACPET’s mission is to enhance quality, choice, innovation and diversity in Australian education and training. ACPET works with governments, education and training providers, industries, and community organisations, to ensure vocational and higher education and training services are well-targeted, accessible, and well-delivered with courses of high quality, and providing for choice and diversity.

ACPET welcomes the opportunity to respond to the Consultation Paper Graduate and Vocational Graduate Certificates and Diplomas in the Australian Qualifications Framework (June 2012) prepared and circulated by the AQF Council. ACPET likewise welcomes ongoing dialogue with the AQF Council on the issues of concern expressed in this submission.

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Opening Statement

ACPET welcomed the intention of the AQF Council to review the Graduate and Vocational Graduate Certificates and Diplomas qualification types in the AQF (November 2011). ACPET notes, and supports, the concern expressed by stakeholders who responded to the review that consistency, stability and simplicity must be maintained, and complexity avoided.

ACPET now welcomes the opportunity to respond to the follow-up Consultation Paper *Graduate and Vocational Graduate Certificates and Diplomas in the Australian Qualifications Framework* (June 2012).

In-principle support for the proposed changes to the qualification types

ACPET supports:

- the need to better define, clarify and align the qualification types at levels 7 and 8 of the AQF
- the need to ensure a smoother upward transition from the AQF level 6, to levels 7, 8 and 9, and a closer relationship between qualifications
- the proposal to re-name the existing Graduate Certificate and Graduate Diploma as consistent with desired Australian taxonomies
- the decision to remove the distinction between Vocational Graduate Certificates/Diplomas and Graduate Certificates/Diplomas by proposing revised descriptors which should allow for either vocational or higher education outcomes. These newly proposed qualification types will be available for accreditation by both the VET and higher education sectors, thus progressing towards the creation of a seamless tertiary education system in Australia, underpinned by the AQF.
- descriptors that accommodate both vocational and higher education outcomes
- the need to differentiate between qualifications aimed at ‘broadening’ and ‘deepening’ knowledge and skills in a discipline/field of study and distinguishing between qualifications that are graduate or postgraduate in purpose (need to clarify/streamline these terms)

Concerns about the proposed revisions to the qualifications

Rationale for the changes

According to the Consultation Paper November 2011, “student participation in both the Graduate Certificates and Graduate Diplomas as they are currently offered has increased over time as part of the broader trend of increasing postgraduate enrolments” (p6).

- Graduate certificate completions have risen substantially for domestic students from 5,259 in 1998 to 12,581 in 2009. For overseas students the increase has been from 517 to 2,423 in 1998 and 2009 respectively (p7).
- ACPET expresses its concern that successful programs are being changed/relocated in the AQF framework with no apparent pedagogical or educational rationale other than to streamline/simplify the AQF and qualification titles. Changes to vocational and higher educational programs need to be justified by pedagogical principles which meet educational needs of students. In the process of
modifying a regulatory framework, and its associated policies, we must not lose sight of and sacrifice educational principles and objectives for the sake of simplicity and consistency.

The proposed removal of the Graduate Certificate and Vocational Graduate Certificate, currently located at AQF level 8 and their replacement with a Graduate Diploma at AQF level 7 will have implications for providers currently offering these qualifications:

These implications include:

• course programs, which would need to be rewritten with different learning outcomes
• non self-accrediting institutions which would be required to apply to TEQSA for course accreditation in order to be able to deliver the new Graduate Diploma

The above would pose an increased administrative and financial impost on these institutions.

The proposed changes to the AQF specifications for the qualification types (point 3, p 6-7 in the Consultation Paper) provide examples of pathways for both nested and non-nested qualification types, according to whether they are ‘deepening’ or ‘broadening’ type qualifications. However, limited rationale is provided as to the reason for specifying different time frames for the delivery of the two types of qualifications.

In an aim to “maintain taxonomic consistency, stability and simplicity of the AQF, and to eschew complexity” (p3 of Consultation paper), the AQF Council proposes revised descriptors for Level 7 and 8 AQF specifications which prescribe learning outcomes which would be applicable to both the higher education and vocational qualifications. This would inevitably bring the two sectors closer together and may pose the risk that homogenising tertiary education may stifle innovation and diversity. This issue is of concern to ACPET.

Implications for educational and study pathways

The current existing arrangement of a Graduate Certificate at AQF level 8 (i.e. 4 subjects or FTE 0.5 – 1.0 year), potentially followed by a Graduate Diploma, and then a Masters degree if desired, provides a pathway for students who are uncertain about their ability to undertake graduate study. These uncertainties arise for a number of reason, such as lack of a first degree, returning to study after a considerable break for personal, lifestyle, or family reasons and sub-optimal experiences in earlier life in relation to formal study. In such cases, the Graduate Certificate is manageable entry point in what can become a pathway to a Master degree. The proposed change to a Graduate Diploma consisting of FTE 1-2 years (8 subjects) may be an unattractive option, overwhelming and unmanageable to many, who may never complete the course.. By removing a pathway (often into Master’s programs) which has proven to be successful, and replacing it with one that has a minimum requirement that is double the size, and hence double the time, and possibly and increased cost, may in fact, may pose a barrier to entry for a significant number of students.

Proposed timing of transition

The proposed date of the 1 January 2013 to initiate the transition period would be difficult to achieve for most non self-accrediting institutions involved in implementing the proposed changes. In some cases major changes to the nesting of courses needs to be made. These changes will need to be approved by TEQSA (refer to point 2 above). ACPET is concerned that the proposed implementation date would require high quality institutions to direct additional resources to introduce new programs in such a short time frame. It may also be impossible for some providers to make appropriate changes in such a short time frame, thus creating a gap in their course offerings, resulting in a diminished business offering.