Professor Derrick Armstrong
Deputy Vice-Chancellor (Education) and Registrar

25 July 2012

Ann Doolette
Executive Director
Australian Qualifications Framework Council
GPO Box 9839
Adelaide
SA 5001

Dear Ms Doolette

The University of Sydney is glad to have the opportunity to respond to the discussion paper *Graduate and Vocational Graduate Certificates and Diplomas in the Australian Qualifications Framework*, June 2012. The University of Sydney previously responded to the AQF’s *Review of Graduate and Vocational Graduate Certificate and Diplomas in the Australian Qualifications Framework*, November 2011 (my letter of 24 February 2012). In our response we supported the removal of the distinction between Vocational Graduate Certificates/Diplomas and Graduate Certificates/Diplomas, and supported Option 1 of the four options, under which Graduate Certificate and Graduate Diploma were retained at AQF level 8. We continue to support this option. The June 2012 proposal from the AQF Council proposes an option not canvassed in November 2011, and we regret that we are unable to support a significant recommendation in it: the removal of the Graduate Certificate from the Framework without an appropriate replacement at level 8. Such a move would disadvantage a significant cohort of current and future Graduate Certificate students. We note that the previous review of the AQF, to which we contributed and which we strongly supported, did not remove any existing, widely-used qualifications, and urge that this smaller review take comparable cognisance of existing practice. We support the observations made by the Go8 in its collective response and also make additional observations below based on our own experience.
The Graduate Certificate

Currently approximate 320-350 students complete Graduate Certificates at the University of Sydney each year in over 75 programs, many of them targeted at highly specialised niches of advanced skill and knowledge acquisition. In addition to those who complete, many decide to upgrade, usually to a Masters qualification. The Graduate Certificate encourages workers to upgrade their skills and knowledge and provides a flexible pathway into higher learning. We are unable to accept the argument (put on page 4 of the proposal) that it is primarily an exit qualification and lacks the robustness needed for an AQF qualification in its own right. The ratio of graduations to commencing enrolments in our Masters programs is over 100%, reflecting the fact that the number of students who transfer up from Graduate Certificates and Graduate Diplomas to Masters degrees is greater than those who exit the Masters degrees early with one of the shorter qualifications. The lack of taxonomic differentiation between the Graduate Certificate and Graduate Diploma in the current AQF (noted on page 4) is the result of a decision taken in the design and construction of Framework and the decision to limit the number of levels, and should not be used as a reason for abolishing a long-standing qualification. The skills and knowledge gained in Graduate Certificates were appropriately described in the AQF First Edition, July 2011, and their attainment makes a significant contribution to the knowledge and skill base of the professions and disciplines they serve. With respect, we suggest that it is not for the AQF council to judge the robustness of the learning outcomes of long-standing programs. That is a job for the accrediting institutions and one for which TEQSA will rightly hold them responsible. Several of our Graduate Certificate programs, such as Indigenous Health and Indigenous Languages, are in areas of current strategic focus for the University of Sydney and also for various State authorities with whom we are in negotiation. Others are used by busy professionals, for example in the health professions, to gain up-to-date knowledge in rapidly expanding fields such as Pain Management, Clinical Epidemiology, Clinical Nursing and Clinical Dentistry. Other important initiatives are Graduate Certificates in commercialisation (offered to PhD students), advanced learning and leadership (offered to PhD students), University Teaching (offered to academic staff members), and a very large number of specialised Graduate Certificates in professional realms, especially in the domains of agriculture, education and health.
There is a danger that, if the current Graduate Certificate at level 8 were abolished much of this training would occur in a non-credentialed manner through professional development. This would be contrary to one of the key aims of the new AQF, embraced by the University of Sydney, of ensuring that workers who undertake training and improve their skills receive appropriate credentials to ensure that their skills are transportable and appropriately recognised.

**Compliance with the AQF Qualification Type Addition and Removal Policy**

Under the existing *AQF Qualification Type Addition and Removal Policy* (July 2011) the AQF Council can remove an existing qualification “if there is clear industry, professional or community need and a sound educational rationale” taking into account the four criteria set out on page 86 of the *Australian Qualifications Framework*, July 2011. We do not accept that there is a clear need to remove the Graduate Certificate and we do not believe that the criteria on page 86 have been met. We cannot agree that the qualification is redundant and there is no evidence of agreement from relevant education and training sectors. The policy states (p. 86) that agreement on equivalence with a remaining AQF qualification type will be a consideration in any decision to remove a qualification by the AQF Council and the proposed Graduate Diploma at level 7, cannot be seen as a replacement for the existing Graduate Certificate at level 8. As explained in our earlier submission, the University of Sydney has a long-standing policy of prohibiting the parallel teaching of undergraduate and postgraduate students except in carefully defined circumstances. Under this policy, which has strong student support, it would not be possible or desirable to replace the existing Graduate Certificates at AQF level 8 with the proposed Graduate Diploma at level 7. The learning outcomes for a level 7 course are necessarily less advanced than at our existing level 8 courses and the replacement level 7 Graduate Diplomas would not meet the educational needs currently met by our Graduate Certificates.

**Our Preference**

Provided that demand exists within the sector, we do not altogether oppose the creation of a qualification at level 7 with the word “Graduate” in the title, since the creation of such
a qualification may be useful in adding breadth to level 7 graduates while also recognizing their status as having achieved a significant level of higher education. We would use this primarily as a compressed undergraduate degree available to students who have already achieved the generic graduate attributes of a Bachelor degree who wish to change disciplines or broaden their field of knowledge prior to postgraduate study in that discipline. This qualification could also provide a valuable pathway for those with a non-bachelor earlier qualification. Similarly, if genuine demand exists for a level 7 qualification of this type, we do not oppose giving the existing Graduate Diploma the title Advanced Graduate Diploma, in order to distinguish it from the level 7 Graduate Diploma. However, we believe that a genuine replacement at level 8 for the current Graduate Certificate needs to be created and, notwithstanding its rejection in the discussion paper, propose that if the Advanced Graduate Diploma is created, there also be an Advanced Graduate Certificate. The creation of both should be contingent on evidence of real demand within the sector for a new level 7 for graduates.

In the absence of such demand, however, our preferred position is the retention of the original nomenclature and level as expressed in our earlier submission: the Graduate Certificate of 0.5 – 1 year at Level 8, and the Graduate Diploma of 1-2 years at Level 8. The combination of the terms “advanced” and “graduate” within a qualification title create a new level of complexity in the AQF with the danger of confusion. This should be avoided unless absolutely necessary. It is natural that the Graduate Diploma will be understood as at a higher level than the proposed Level 7. There is real potential for the Advanced Graduate Diploma to be confused with the VET Advanced Diploma and the distinction between the Advanced Diploma, the Graduate Diploma, and the Advanced Graduate Diploma will not be obvious to the general public from the title alone.

Implementation deadline

Finally, the timeline proposed is a major stumbling block. It would be impossible for a change of such magnitude to be implemented by the same deadline of 1 January 2015 (for commencing students) as the AQF First Edition July 2011. Courses offered to international students commencing in 2015 are advertised in 2013, and the need to secure CRICOS registration prior to advertising means that Universities will need to accredit these courses by mid 2013 at the latest. Any necessary curriculum development
would need to be completed in 2012. It would not be sensible or feasible to try to fit the work accommodating students displaced by the abolition of the Graduate Certificate into a 6 month period, especially as all other AQF compliance changes are being finalized during this time. In summary, the University:

- Strongly opposes the abolition of the Graduate Certificate of 0.5 – 1 year’s duration at level 8
- Does not oppose the creation of a Graduate qualification with an appropriate name (not Graduate Diploma) provided that genuine demand exists for such a qualification of 1 – 2 years duration at level 7
- Supports the retention of the Graduate Diploma as a Level 8 qualification of 1-2 years
- In the event that the Graduate Certificate is abolished, does not believe a 2015 deadline is feasible or sensible and recommends a deadline of no earlier than 1 January 2017.

Yours sincerely

(Signature removed for electronic distribution)

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Deputy Vice-Chancellor (Education) & Registrar