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Dear Ann

On behalf of the Australasian Council of Deans of Arts, Social Sciences and Humanities (DASSH), I would like to thank the Australian Qualifications Framework Council for addressing many of our members' concerns and taking up many of our suggestions in the *Graduate and Vocational Graduate Certificates and Diplomas in the Australian Qualifications Framework June 2012*. In particular DASSH supports:

- Enabling the Graduate Diploma and Advanced Graduate Diploma to both broaden and deepen knowledge (without requiring backtracking for those students, who are changing discipline focus).
- Removing the distinction between graduate/postgraduate and vocational graduate/postgraduate qualifications.
- Enabling the Graduate Diploma to be used as an equivalent to a major in an undergraduate course and the Advanced Graduate Diploma as nearly an equivalent to an Honours qualification. The main benefit of this approach is enabling an Advanced Graduate Diploma student to then use their qualification to lead into a Masters qualification, requiring only one year's further study if in the same discipline and 1.5 years if changing discipline.

DASSH however believes that a January 2013 introduction for the proposed changes to Graduate Certificates and Diploma is not feasible. Programs for 2013 have already been marketed and promoted to prospective students and offers made – a much longer lead-time is required for making substantive changes to program offerings and for communicating these changes to prospective students. The changes suggested are substantive and they require further consultation. In particular, we would like the AQFC to review and consider the following:

#### **Retention of the Graduate Certificate**

DASSH members question the abolition of the Graduate Certificate and believe that the AQF has not provided evidence of its not being sufficiently robust (through lack of volume) as a stand-alone qualification or as a pathway into higher-level qualifications. This AQFC view is inconsistent with both the initial concept of the Graduate Certificate and Diploma levels permitting different volumes of time or input to distinguish qualifications at the same level and the long history of academic and industry use and acceptance of the Graduate Certificate. The Graduate Certificate in its current form serves a useful purpose.

Many ASSH faculties offer a wide range of Graduate Certificate awards in disciplines that include Education; Language and Language Teaching; Governance, Public and Economic Policy; Communications, Screen and Media Production; Social Work, Counselling and

Community Services; International Relations; Tourism; Environmental Law, Management and Compliance; Law and Legal Studies; Theology; Archaeology and Cultural Heritage Management, amongst others. Most of these are nested within other awards, but some are stand-alone qualifications serving discrete educational objectives. Although intermediate level awards ought to prepare students for further learning, there is no reason to refuse to accept that such qualifications, for many stakeholders, might be sufficient as terminating awards, particularly as a professional credentialing and skills upgrade studied either full or part-time. Universities need to be able to respond to the changing needs of large employers and major sectors of the economy and anticipate the challenges associated with time-poor students. In particular, the Graduate Certificate provides options for the development of programs tailored to the specific needs of an employer and/or options for providing graduates with the opportunity to gain expertise in relation to present workplace responsibilities.

Most Graduate Certificates completed for these purposes are completed part-time across a year or two years of study. While employers might consider supporting employees to undertake a Graduate Certificate they are unlikely to support, or employees commit to, a longer and more expensive program. The part-time Graduate Certificate is usefully promoted as a year of engagement in relevant study associated with the workplace. Often students complete a relevant practical project as part of their Graduate Certificate. These examples demonstrate that the awards are educationally robust, especially when the students bring rich and broad experience. In these instances, elimination of the Graduate Certificate and its associated six-month typical volume of learning will likely require massive effort in curriculum re-development to establish intermediate level qualifications associated with at least one year minimum volume of learning. Elimination of the award therefore risks collapse of a substantial market (successful examples<sup>1</sup> include the UQ Graduates Certificates in Community Relations, Educational Studies and Higher Education, International Customs Law and Administration designed for specific professional cohorts).

An example of one DASSH member's<sup>2</sup> 197 enrolments in the Faculty's Graduate Certificates has a breakdown of 77% (151) female; 12% low SES; and 57% in the 30-49 age bracket. All but one are undertaking studies on a part-time basis. A similar breakdown would be common across other member faculties. Removal of the Graduate Certificate will have a differential impact, hitting hardest on females and mature-age students. The fact that virtually all are pursuing their studies part-time strongly suggests that they have major other commitments, likely either employment- or family-oriented. Unless it is assumed that such groups will commit to doubling their devotion of time to study, then aspirations of these two groups to improve their education risk being thwarted.

Graduate Certificate awards provide a useful pathway for students and are positioned as an attractive exit point for students stepping up from short courses (e.g. to meet their continuing professional development requirements) to a more formal commitment to education and as a possible pathway to Masters to students:

- a. who have not considered the option of pursuing a Graduate Diploma or Masters but determine this after completing the Graduate Certificate; or

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<sup>1</sup> Examples provided courtesy of The University of Queensland and the University of Canberra

<sup>2</sup> Statistics provided courtesy of Flinders University, Faculty of Education, Humanities and Law

- b. who do not meet direct entry to the Masters program but can be provided with the opportunity to progress stepwise through a suite of nested programs conditional on demonstration of appropriate levels of achievement.

#### **Enabling concurrent graduate diploma study**

The Report is silent on enabling concurrent Graduate Diploma study while completing a Bachelor's Degree. DASSH seeks confirmation from AQF that a student's concurrent study of a diploma while completing an undergraduate degree is supported by the AQF. Currently there is diversity of practice in Australian universities, with some offering concurrent undergraduate certificates or diplomas in disciplines to allow students pursuing, for example, a Bachelor of Architecture, who also wish to study design or a language (but not necessarily a Bachelor of Arts) to complete the equivalent of a major or minor program of study alongside their primary Bachelor program. Given the alarmingly low level of foreign language study in Australia and its vital importance to Australia's role in international trade, politics and security, the removal of concurrent certificates and diplomas is certain to put further pressure on many University language programs, currently struggling to survive. There appears to be contradictory advice to DASSH members from AQF on this matter. DASSH urges the preservation of these concurrent awards, particularly as a necessary means of preserving the existing range of languages, valuable to this country's future ability to participate in the Asian Century.

#### **Clarification of capped postgraduate loads**

DASSH also seeks clarification of the relationship between AQF designating the Graduate Diploma as providing Level 7 attainment (equivalent to an undergraduate Bachelor Degree) and the capping of Commonwealth Grant Scheme Funded Postgraduate Coursework programs. If Graduate Diplomas are recognised by the AQF as undergraduate programs, will enrolments in these be recognised by DIISRTE as falling into 'uncapped' undergraduate places, or will they continue to be viewed as contributing to 'capped' postgraduate load? DASSH recognises the importance of Graduate Diplomas in enhancing the qualifications and skills of Australian students and would hope that a consistent policy supporting students to attain an undergraduate award would include Graduate Diplomas within the scope of undergraduate study.

DASSH strongly urges the AQFC to consider our recommendations above and in particular to reconsider removal of the graduate certificate qualifications and the significant impact on the Higher Education sector and accessibility of graduate qualifications.

Yours sincerely



**Professor Krishna Sen**  
**President**

(and Dean, Faculty of Arts, Humanities and Social Sciences, University of Western Australia)