

Our Ref: #125740

23 July 2012

aqfc@innovation.gov.au

Ann Doolette
Executive Director
Australian Qualifications Framework Council

Dear Ms Doolette

Comments on 'Graduate and Vocational Graduate Certificates and Diplomas in the Australian Qualifications Framework June 2012'

I refer to your email of 2 July requesting comments on the proposed changes to the AQF as outlined in the June 2012 discussion paper. I have four comments:

1. I support the proposal to remove the distinction between *graduate* and *vocational graduate* awards. The distinction did little to clarify the purpose of the awards and always had the potential to undermine the status of awards delivered through the Vocational Education and Training sector.
2. I support the proposal to locate the graduate diploma at level 7 and the advanced graduate diploma at level 8. It seems to me that this provides for a logical and coherent progression in the AQF structure.
3. I support the proposal that the graduate diploma and graduate advanced diplomas should be available for accreditation and issuance in both the higher education and vocational education and training sectors. It recognises that qualifications at this level are a 'crossover' between the higher education and vocational education and training sectors.
4. I am not so sure, though, on the proposal to remove the graduate certificate awards from the AQF. It seems to me that they provide useful exit points to the graduate diploma awards and offer prospective students an option if they are unsure about enrolling in a graduate diploma award. I don't think that statements of attainment are an ideal way of recognising early exit points when an alternative is possible. I note that there is considerable discussion in the Vocational Education and Training sector about the use of *skill sets* (rather than statements of attainment), presumably in an attempt to recognise meaningful subsets of qualifications. Finally, I would point out that the number of students in vocational graduate certificates dominates the number in vocational graduate diplomas (in 2011 there were 2,400 students in vocational graduate certificates reported to NCVER compared to 250 in vocational graduate diplomas), although I acknowledge that the numbers of enrolments in these vocational graduate qualifications are very small.

Yours sincerely



Tom Karmel
Managing Director