

Building a skilled and adaptable workforce

Response to the
Productivity
Commission's
interim report

September 2025



THE UNIVERSITY OF
MELBOURNE

Building a skilled and adaptable workforce

The University of Melbourne (the University) welcomes the opportunity to respond to the Productivity Commission's interim report on its inquiry into *Building a skilled and adaptable workforce*.

The University is focussing its response to *Draft recommendation 2.1: Move toward a national system of credit transfer and recognition of prior learning* (Appendix A has the Commission's recommendation in full), as well as *Information requests* which are relevant to credit transfer and recognition of prior learning (RPL).

While in-principle the University supports a national system of credit transfer and recognition of prior learning (RPL), we urge caution to ensure that, if pursued, it does not unintentionally drive system homogenisation, undermine institutional autonomy or mandate credit transfer requirements.

The University's preference would be for a principles-based approach to improving credit transfer and RPL. As a first principle, this complex task should be left to individual providers. Secondly, providers should commit to sharing best practice and transparency in decision-making to mitigate some of the shortcomings of the current state but also allow the sector to evolve and improve practices.

A great strength of the Australian post-secondary education sector is the diversity of its institutions and their educational offer to students. This diversity exists at the program level – even if programs are similarly named – as well as with 'units' or 'subjects' within programs. An approach to credit transfer and RPL which centres on broadly defined skills and capabilities, if not designed carefully, has the potential to undervalue and potentially undermine this diversity. Responsiveness to student preferences and diverse approaches to education must be conserved and fostered by maintaining provider autonomy. This should include ensuring providers are able to maintain variations in programming and entry standards by leaving ultimate decisions about credit transfer and recognition of prior learning to providers.

For further information or to discuss the response, Professor Gregor Kennedy, Deputy Vice-Chancellor (Academic), can be contacted at gek@unimelb.edu.au.

Information request 2.1 - The impacts and use of credit transfer and RPL

How do the current challenges in navigating credit transfer and RPL impact Aboriginal and Torres Strait Islander people, people with disability, people living in regional and remote locations, women, mature aged workers, and people from culturally and linguistically diverse backgrounds?

Aboriginal and Torres Strait Islander peoples, people with disability, those in regional and remote areas, women, mature-aged workers and people from culturally and linguistically diverse backgrounds are generally more likely to have non-linear educational or career pathways.

Flexible, shorter form, and informal community-based education are also common among cohorts underrepresented in formal tertiary education. For students with non-linear educational or career pathways the complexity of applying, inconsistency across providers and lack of transparency in individual provider rules can complicate their efforts to seek credit transfer and RPL. Learners from these cohorts may also lack access to networks or support systems that can help them navigate credit and RPL processes, leaving them at a disadvantage compared to their peers.

Information request 2.2 - Establishing a national credit database

The PC is interested in participant views on the following questions.

1. Is a national credit database feasible with the current credit data infrastructure?

Feasibility would depend on sector-wide agreement on common data standards and ensuring that institutional systems can integrate without increasing administrative burden. It would require dedicated government funding to develop.

2. Would it be possible to codify RPL decisions into the database? What are the key challenges?

Technically, it would be possible to codify RPL decisions into the database. This would require participating providers to agree to common data standards and, importantly, common decision rules for RPL.

With regards to common data standards, an example of what could be applied is the MortarCAPS Higher Learning Data Standard (MCDS). MCDS provides a structured, interoperable framework for managing higher learning data, and has been developed through working groups of the Council of Australasian University Directors of Information Technology (CAUDIT). However, moving all participating providers to this standard would be complex, expensive and require extensive administrative work.

While common data standards could be applied, the common application of these standards across providers' programs could undermine the diversity of courses. A strong and inflexible emphasis on codifying decisions may lead to providers being unable to maintain the distinctiveness of their offerings. If RPL/credit decisions are codified into a database, precedent decisions must be advisory rather than be binding for providers.

A final challenge is that precedent decisions will likely date as units, subjects and courses evolve. The design of the database and the maintenance of the data within it would have to take this into account.

3. What are the major risks of establishing a national database? How can they be mitigated?

Existing technology would allow for a national database which combines precedents with AI-driven assessments of course similarities. However, a national database, without careful attention to design could unintentionally lead to providers standardising their offerings to students. The design of any system should be such that efficiency is balanced with system diversity and that decisions about credit and prior learning remain with individual providers.

Privacy risks for both students and education providers could also arise from a national database. Both students and providers would need assurance that their personal and proprietary information will be rigorously protected. Transparent policies and practices regarding data usage and sharing would be crucial in building and maintaining this trust. Implementing stringent access controls and encryption technologies would be necessary to help mitigate privacy risks.

4. What are the key barriers to coordinating consistent and accurate data on credit decisions across providers? How can providers be supported to overcome these barriers?

The key barrier technically is the cost of integration. Many institutions, particularly smaller ones, may struggle with the financial and technical resources required for integration. A data standard should lessen this issue and shared development of interfaces to Curriculum Management and Student Management systems would also reduce the cost to individual institutions.

Costs will be ongoing as the database will have to be continuously updated with new courses, revisions to courses, and decision-rules.

Information request 2.3 - Recognition of Prior Learning (RPL) assessments

The PC is interested in hearing from education providers that have RPL assessment processes.

1. What approaches are used? What costs are incurred? What level of staff involvement is required?

The University currently operates faculty-led RPL processes, with assessments conducted by academic staff according to discipline-specific learning outcomes (unless a precedent recognition has been established).

Validation of prior learning for specific academic programs is undertaken by academic staff based on evidence submitted by students. While approaches vary by course and level of study, all aim to ensure student background and prior knowledge and learning is aligned with the academic requirements of specific programs.

2. Would it be helpful to have a coordinated RPL assessment process that spans across multiple education providers? Would that be feasible? What would be the challenges and risks?

While a coordinated RPL assessment process spanning multiple education providers would have value in some scenarios, implementing such a process would have to be done in such a way as to ensure that the variation in and rich diversity of course offerings across institutions are not impacted. A coordinated RPL assessment process would need to be established on an opt-in basis for providers.

A coordinated RPL system must also consider professional accreditation requirements, which often impose strict conditions on recognising prior learning.

Additionally, a coordinated assessment process would have to be implemented in such a way as not to limit other means of RPL. Each student's learning journey is unique, and flexibility in recognising prior learning is essential to accommodate diverse educational backgrounds and experiences.

Appendix A – Productivity Commission’s draft recommendation 2.1

Draft recommendation 2.1

Move toward a national system of credit transfer and recognition of prior learning (RPL)

To better enable credit transfer and RPL, the Australian Government should:

- enforce the right to have credit transfer or RPL assessed before the deadline for accepting an offer
- develop a national database of academic credit decisions
- develop a model of coordinated assessments of prior learning, and possibly of credit transfers.

Students could draw on the database to better understand possible tertiary education pathways, making decisions about the allocation of credit more transparent and providers more accountable.

The Government should consider a staged approach to establishing the database that begins with compiling credit transfer decisions, before including credit granted from different types of learning, such as microcredentials, informal learning or work experience, including international work experience.

The Australian Tertiary Education Commission, as steward of the tertiary education system, should play a role in establishing the database and enforcing consistent and accurate data collection from providers.

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