

CAT^OHR

Building a skilled and adaptable workforce:

Response to Interim Report:

**Draft Recommendation 2.1 Move towards a
national system of credit transfer and recognition
of prior learning (RPL)**

Candidate-Centred?



Only if it's Assessor-Led.

About the author of this response:

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She has played a pivotal role in several large-scale Australian RPL projects, including:

- **Human Services Skills Organisation's national pilot (2021)** for Certificate III in Individual Support, where she designed and developed the RPL assessment tools and guides, as well as designed and delivered the assessor training.
- **Industry-focused projects** such as the Construction Industry Training Board (SA) initiative to qualify 200 riggers and scaffolders (2011)
- **RPL Mentor** for the *Reframing the Future – RPL Done Well* Project (South Australia), providing capability training to assessors and supporting workers affected by the Mitsubishi and Bridgestone plant closures (2009).

Wendy's innovative clustered **RPL Toolkit for the TAE40116 Certificate IV in Training and Assessment** was awarded second prize at the prestigious *3rd Validated Prior Learning (VPL) Biennale* in Germany (2019), recognised by leading global experts in skills recognition and validation.

Her expertise is sought internationally, with invitations to present at major conferences, including:

- *Canadian Association for Prior Learning Assessment (CAPLA) Conference*, May 2025.
- *ePIC Recognition Conference, Paris*, November 2024.
- *5th VPL Biennale, Kilkenny Ireland*, May 2024.
- *IVETA World TVET Conference, Fiji*, 2016.
- *Canadian Association for Prior Learning Assessment (CAPLA) Fall Conference* (2011)

Wendy is the designer and developer of **Australia's first Advanced RPL Assessor Micro-credential**, one of only three such programs worldwide, attracting both domestic and international participants. She is also the author of the RPL practice-based eBook, recently updated to align with the *Standards for RTOs 2025*:

- *Mastering Recognition of Prior Learning: Using a Candidate-Centred Approach*

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Preliminary Comments

Draft recommendation 2.1

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

- **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.**

Draft Recommendation 2.1 assumes that Higher Education (HE) and Vocational Education and Training (VET) operate in similar ways. **They do not.** Both fall under the broad label of “tertiary education,” *but the systems are fundamentally different.* Comparing them is less apples-to-apples, and more apples-to-chickens.

There also appears to be an assumption that Credit Transfer and RPL operate under the same processes. In practice, they are two *very distinct practices with clearly defined frameworks within the VET sector.* By contrast, in Higher Education they are often treated as a single issue, which may reflect a limited understanding of the nuances of Credit Transfer and RPL, *potentially influenced by the absence of assessor-specific training within the HE sector.*

Vocational Education and Training (VET) System Summary

- *Highly regulated* by the Australian Skills Quality Authority (ASQA).
- Compliance with the Standards for Registered Training Organisations (RTOs) is *mandatory*, with penalties for breaches which can include de-registration.
- Operates on a *competency-based* model, with *nationally industry endorsed* Training Packages (AQF 1–8) that cannot be changed without industry agreement.
- Assessment must meet strict national rules related to assessment including: the Principles of Assessment and the Rules of Evidence.
- RTOs *are legally required to offer* both Credit Transfer and RPL, which are distinct processes.
- *Assessors must be trained*, in assessment practices; not necessarily in RPL assessment though.

Higher Education (HE) System Summary

- *Less prescriptive regulation*, overseen by TEQSA with a lighter-touch approach.
- Not competency-based. Learning outcomes are set by individual institutions, with *no national consistency* even in similar courses.
- *No legislative requirement to offer RPL or Credit Transfer*. Where credit is offered, it is discretionary and inconsistent.
- *Does not offer RPL*
- *No requirement for lecturers/ tutors / assessors to be training in assessment*.

Why this matters

Assuming alignment between HE and VET overlooks these differences. *Recommendations that treat the two systems as equivalent, risk being unworkable for VET providers and misleading for policy design.*

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?

The challenges in navigating credit transfer and RPL create significant inequities across the VET and Higher Education systems. While these pathways should enable fair recognition of skills and knowledge, current policy and practice settings too often disadvantage Aboriginal and Torres Strait Islander peoples, people with disability, regional and remote learners, women, mature-aged workers, and people from culturally and linguistically diverse (CALD) backgrounds.

Vocational Education and Training (VET) System

Credit Transfer processes are outlined in the Standards for RTOs and Credit Transfer is provided at no cost, when using it towards a qualification. The process is the same for everyone.

RPL

- **Funding disparity:** Inconsistent and inadequate funding for RPL across states and territories (e.g. Victoria's 25% reimbursement rate) deters RTOs from offering robust RPL pathways. This disproportionately impacts groups who are most reliant Candidate Centred, Assessor Led (non-document heavy) on affordable, flexible recognition options.
- **Documentation barriers:** Many individuals — particularly Aboriginal and Torres Strait Islander people, CALD communities, women in casualised sectors, and mature-aged or self-employed workers — often cannot provide formal documentation of skills due to poverty, climate-related events destroying records, casualised or informal work arrangements, or lack of employer support.
- **Shift to document-heavy processes:** Underfunding of RPL has pushed many RTOs towards paper-based, audit-style RPL rather than candidate-centred, assessor-led models. This disadvantages candidates without workplace support, those from non-English speaking backgrounds, Aboriginal and Torres Strait Islander peoples and with persons with a disability and those who are neurodiverse.

- **Regional and remote disadvantage:** Thin markets, limited provider choice, significant travel costs, underfunding and a shortage of well-trained RPL assessors create significant barriers for regional and remote learners.
- **Assessment inequities:** Over-reliance on written knowledge questions (rather than oral questions) and third-party reports, contributes to disadvantages experienced by First Nations candidates, CALD learners, women in community-based roles, people with disability, and older workers whose skills may be demonstrated more effectively through practical observation and discussion.
- **Qualification restrictions:** Some states and territories (such as WA) limit RPL accreditation to 80% of a qualification, forcing candidates (often women, CALD learners, and mature-aged workers with extensive existing skills) to repeat training unnecessarily.

Higher Education (HE) System

- **No legislative requirement:** Credit transfer and RPL remain discretionary and inconsistent across the HE sector. This limits equitable access, especially for learners transitioning from VET or bringing skills from work based learning or other lifelong learning experiences outside of formal learning.
- **Non-recognition of informal and non-HE learning:** HE institutions rarely acknowledge skills gained through work, life, or community experience. This disadvantages women (particularly those with caring responsibilities), First Nations learners, CALD communities, and mature-aged workers.
- **Lack of RPL specialists:** Unlike comparable international systems (e.g. Europe, Canada, Ireland), Australian HE lacks trained RPL specialists, further embedding inconsistent and exclusionary practice.

Overall Impact

Across both VET and Higher Education, these sector relevant systemic challenges:

- Exclude disadvantaged cohorts from meaningful participation in education and training.
- Reinforce inequities in workforce participation, career mobility, and recognition of skills.
- Devalue lived in and work-based experience, especially for those outside mainstream, continuous employment.
- Create cycles of disadvantage by requiring individuals to repeat learning they already possess or disengage altogether.

Summary

To ensure equitable outcomes, both VET and Higher Education require consistent a tailored national policy, for each sector that includes adequate funding for candidate - centred, assessor-led RPL, recognition of diverse evidence types, and investment in assessor capability. Without this, current practices will continue to disadvantage Aboriginal and Torres Strait Islander peoples, people with disability, regional and remote learners, women, mature-aged workers, and CALD communities.

Note: the following dot point is included in Draft Recommendation 2.1 but did not ask for any feedback. However, as this point has been made the following information has been provided to further clarify / identify possible implementation challenges:

- Enforce the right to have credit transfer or RPL assessed before the deadline of accepting the offer.

Higher Education (HE) System

HE should be providing Credit Transfer prior to acceptance of an offer.

HE does not provide RPL, and until there is an identified practice and process this question is unable to be addressed.

Vocational Education and Training (VET) System

VET has the capability to instantly assess Credit Transfer and usually would identify to any Candidate if they had gained Credit Transfer prior to enrolment

Given that *RPL is not about only assessing documentation and can be a “living” assessment*” due to the variance of assessment tasks and **the requirement to provide GAP training within the RPL process**¹, this would not be feasible to conduct prior to enrolment. Remembering that VET candidates can enrol for RPL for an entire qualification.

¹ ASQA Practice Guide Outcome Standard 1.6

Information request 2.2

Establishing a national credit database

1. Is a national credit database feasible with the current credit data infrastructure?
2. Would it be possible to codify RPL decisions into the database? What are the key challenges?
3. What are the major risks of establishing a national database? How can they be mitigated?
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?

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

Vocational Education and Training (VET) System

Within the VET sector, **a national credit database already exists** in the form of the National Training Register for VET <https://training.gov.au/>.

This database contains every nationally endorsed unit of competency, skill set, and qualification. Registered Training Organisations (RTOs) can trace unit codes and apply the *Standards for RTOs* to determine when credit transfer is to be granted. Importantly, units, skill sets and qualifications cannot be altered in an ad hoc manner; changes must be endorsed by industry and follow a formal, often lengthy, approval process. In this respect, the VET system already has the necessary infrastructure in place to support consistent credit transfer arrangements. This is a relatively simple and as such there is no cost to the applicant as per the Standards for RTOs.

Higher Education (HE) System

By contrast, the higher education sector operates with significantly less national consistency. Each of the approximately 43 institutions develop and manages its own courses independently. As a result, establishing and maintaining a single national credit database would be highly resource intensive. Even minor modifications to a course—such as altering a section of one module—would necessitate widespread and ongoing updates to the database.

While a central database may provide limited benefit for higher education, a more effective approach would be to encourage greater alignment and consensus across institutions regarding the core content of common qualifications (e.g., Accounting, nursing etc). This could occur in conjunction with Industry bodies like Jobs and Skills

Councils (JSC) where relevant or professional bodies such as Law Council of Australia, Engineers Australia and / or the Australian Medical Council. Establishing agreed core components, while allowing electives to vary, would significantly improve portability and support student mobility.

Current Challenges

The lack of alignment currently creates substantial barriers for students. For example, an individual relocating interstate midway through a degree may find only a small proportion of prior study recognised by a new institution, despite significant overlap in content. This not only prolongs study duration but also creates financial and personal hardship. Such experiences are not uncommon across the HE sector.

Recommended Approach

Rather than the sole focus focusing of building a credit database, *investment would be better directed towards a national project aimed at:*

- Developing agreed common cores across major disciplines,
- Building portability and flexibility into HE qualifications, and
- Supporting institutional culture change through training of academic staff in consistent credit transfer and recognition of prior learning (RPL) practices.

This approach could be modelled on international best practice, such as Ireland's *Technological Higher Education Sector RPL Project*.²

Summary

For the VET sector, a national database is already embedded and effective.

For higher education, the priority ***should not*** be the creation of another database but rather ***fostering portability, alignment, and cultural change and consensus across the Australian HE sector***, to ensure students can transfer learning without unnecessary duplication. This would strengthen responsiveness, reduce barriers to skills acquisition, and better support the Australian economy.

² Pages 16-17 of this report

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

Higher Education (HE) System

Recognition of Prior Learning (RPL) is not undertaken within the Higher Education (HE) sector in any systematic form, and therefore this question cannot be addressed for a sector who do not have any RPL decisions to populate a database.

Vocational Education and Training (VET) System

Within the Vocational Education and Training (VET) sector, RPL does not operate as a uniform or standardised process. *It is a candidate-centred, assessor-led approach, acknowledging that “one size does not fit all.”* Evidence requirements and assessment pathways vary significantly between candidates:

- Some candidates have access to workplace documentation and employer support, (Employer-Supported) enabling assessors to verify skills and knowledge through documentation and workplace observation.
- Other candidates, however, may not have access to such records (Non-Employer Supported) due to the nature of their work, insecure or casual employment, or broader factors such as displacement caused by conflict or climate change. In these cases, assessment relies more heavily on methods such as demonstration (challenge tests) and professional discussion (scenario-based or workplace discussions).

*Because of this diversity, codifying RPL decisions into a national database would require capturing a potentially infinite range of individualised evidence and assessment judgments. This would be **highly complex, resource-intensive, and unlikely to produce standardised or comparable outcomes.***

A further challenge is the **declining availability of qualified RPL assessors**. While assessor training in RPL was once common across the VET system, this has reduced markedly, due to the changes to Standards for RTOs over the years that allowed persons who have not been trained in RPL to become assessors, contributing to a shortage of assessors with the expertise to conduct candidate-centred, assessor-led RPL assessments.

Summary:

Codifying RPL decisions is not feasible or financially viable within the VET system due to the highly individualised nature of the process, the variability in evidence available, and the **declining RPL capability of the assessor workforce**.

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

The major risk of establishing a national database is that this **process would be highly complex, resource-intensive, and unlikely to produce standardised or comparable outcomes**, particularly if HE Institutions cannot come to some form of commonality across their credit transfer processes.

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

Because of this diversity across the VET and HE sectors, codifying credit decisions into a national database would require capturing a potentially infinite range of individualised evidence and assessment judgments. This would be **highly complex, resource-intensive, and unlikely to produce standardised or comparable outcomes**, particularly if HE Institutions cannot come to some form of commonality across their credit processes.

Recommended Approach

Due to the lack of knowledge and skill within HE institutions related to credit transfer it is recommended that the following be implemented to support HE institutions to overcome barriers include the following:

- The development of *assessor training* in Credit Transfer practices and process be undertaken.
- The creation of a nation *Community of Learning* around Credit Transfer practices and processes for HE assessors
- The *creation of Credit Transfer assessment specialists* within each HE institution (each who should be members of the Community of Learning to create best practice and benchmarks to enable better consistency and transparency.

Information request 2.3

Recognition of Prior Learning (RPL) assessments

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

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

a) What approaches are used?

Higher Education (HE) System

Recognition of *Prior Learning (RPL)* is not undertaken within the Higher Education (HE) sector in any systematic form, and therefore this question cannot be addressed for that sector.

Vocational Education and Training (VET) System

Currently there are predominately two RPL approaches being used:

The model utilising best practices and processes from the national project: Reframing the Future: RPL Done Well (2004). McKenna, Suzy; Mitchell, John. This model involves Candidate Centred, Assessor - Led practices and process. This is predominately used by Enterprise RTOs (those owned by industry / occupational sectors), independent RTOs and Community Based RTOs.

Due to the steady decrease in funding by many states and territories for the conducting of RPL Assessments since the Reframing the Future Project ceased (where RTOs were paid 100% of unit costs; equal to learn and assess funding) but this is now down to as low as 25% (Victoria), *many RTOs no longer deliver RPL even though they are legal obligated to do so as it is just not financially viable.*

Other RTOs in order address reduced RPL funding and comply with their legislative requirements to provide RPL, *have moved to a portfolio and self-assessment method* which leaves many candidates who have no documents (Non-Employer Supported) disadvantaged. This is because this model is not assessor supported prior or during the RPL process i.e. it is virtually a desk audit of evidence the candidate has supplied, with little or no support from the RTO or assessor. *This practice and associated processes have led to significant questions by ASQA around adherence to the Principles of Assessment and Rules of Evidence particularly around validity, currency and authenticity of the evidence being collected, resulting in a significant number of RTOs*

being deregistered for non-compliant RPL practices and processes in the past 12 months. The document heavy process with little to no assessor support is not a fair or flexible (Principles of Assessment requirements) practice.

The VET RPL Candidate Centred, Assessor Led processes and practices has proven ability and flexibility, to concentrate not just on formal learning, thus is able to embrace the more marginalised people of our nation e.g. 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 further behind.

What level of staff involvement is required and what costs do they occur?

The level of staff involvement required for Recognition of Prior Learning (RPL)

undertaken in accordance with regulatory expectations **is significant**. High-quality and compliant RPL (as outlined in the ASQA Practice Guide) necessitates that both the RTO and the assessor actively support candidates prior to enrolment as well as throughout the entire process. This includes providing clear information about the process, helping candidates understand their options, and ensuring they are able to make an informed decision before committing to enrolment.

Delivering RPL in a compliant manner requires multiple stages of staff engagement, each of which carries associated costs. These include:

1. **Pre-enrolment information** – Written or video resources outlining qualification and unit details, clustering arrangements (if applicable), costs, and options for addressing gaps in evidence (e.g., minor gaps through supplementary training; significant gaps through full unit enrolment).
2. **Assessor engagement** – Candidate discussions with an assessor to clarify information, answer questions, and begin identifying potential evidence sources prior to enrolment.
3. **Assessment Information sharing** – Guidance for assessors, candidates, and employers (where relevant) on the assessment tasks to be undertaken and any specific requirements (e.g., workplace access or challenge tests).
4. **Assessment activities** – Conducted by the assessor and including:
 - Practical assessments (onsite at the RTO or in the workplace, which may involve travel).
 - Oral professional or workplace discussions, which can be supported by voice-to-text recording to ensure authenticity and accessibility.
 - Review and validation of documentation provided by candidates.

- Ensuring evidence aligns with unit requirements, including moderation with other assessors where gaps are identified.
- Delivery of any required gap training.

5. **Finalisation** – Signing off assessments and providing structured feedback to candidates.

Because **RPL is tailored to the unique circumstances of each individual**, it is inherently resource-intensive and can often be as costly—if not more so—than traditional learning and assessment pathways. While emerging technologies, such as AI, may assist with streamlining some elements of the process, ASQA requirements make clear that **assessment and decision-making must remain human-led**.

In summary, RPL done well is not a “one size fits all” approach. It requires a personalised, compliant, and **labour-intensive process that carries costs commensurate with the quality and rigour expected in the VET sector**.

*Note: Some of these costs may be mitigated using AI to **assist** in the RPL process (not conduct it). AI assistance relates to developing scenarios, use of Virtual Reality, voice to text applications, contextaulisation of assessments for specific cohorts i.e. low levels of literacy etc.*

Below is an analysis of AI applications related to its RPL capabilities provided by AI itself (ChatGPT)

- AI struggles to interpret context, nuance, and “real-world” application of skills
- AI cannot reliably confirm whether evidence (e.g., documents, work samples) is genuinely produced by the candidate
- RPL is meant to be assessor-led and candidate-supported. AI cannot provide the reassurance, clarification, or personalised guidance that a human assessor offers during questioning or evidence gathering.
- Many units of competency require observation of performance in real or simulated workplaces. AI cannot directly witness or assess hands-on skills, only review submitted artefacts.
- Biases in AI systems may unfairly disadvantage certain candidates,
- VET regulatory frameworks (like ASQA requirements in Australia) expect assessments to meet rules of evidence and principles of assessment.
- Current AI tools cannot guarantee validity, reliability, authenticity, and sufficiency of evidence without human oversight.

- Candidates may demonstrate competence in unique ways not anticipated by assessment tools. AI typically struggles with flexibility when evidence does not fit structured formats.
- RTOs relying too heavily on AI could weaken assessor capability, leading to poor compliance outcomes if audits reveal assessments were not properly human-led.

2. **Question: 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**

Higher Education (HE) System

Recognition of Prior Learning (RPL) is not currently undertaken in any systematic or consistent way across the Higher Education (HE) sector. As such, it is not possible to meaningfully address the question for HE until the sector first determines:

- what RPL means in its context,
- how it should be applied,
- who will be responsible for conducting assessments, and

The key risks in attempting to implement an RPL framework without these foundations include:

- insufficient numbers of assessors with the required skills,
- inconsistent assessment outcomes,
- reduced credibility of the sector, and
- disillusionment of applicants.

Without the underpinning structural capability, a coordinated RPL system in HE would not be financially viable or credible and serious thought should be given to set up a project based on the recent HE RPL Irish pilot:

This approach could be modelled on international best practice, such as Ireland's *Technological Higher Education Sector RPL Project*.

The Irish framework demonstrates how system-wide alignment, supported by staff training and clear processes, can enable more consistent and informed credit transfer decisions. This was undertaken by developing a framework for implementation.

The purpose of the Framework was as follows:

Support Higher Education Institutes (HEIs) in developing a shared understanding of RPL and in achieving coherence and consistency in policy and practice within and across HEIs.

- Influence the direction, enhancement, and further mainstreaming of HEIs' policies and processes for RPL.
- Provide tools to support growth in the number of learners benefiting from RPL in higher education.
- Expand RPL across the higher-education sector and enhance learners' experience of RPL.
- Assist HEIs in communicating their institutional commitment to RPL.
- Raise awareness and increase transparency of RPL processes for staff, current and potential learners, and external partners (ranging from companies to civic and community organisations).
- Assist HEIs in responding in an agile manner to economic/labour-market and societal needs, allowing learners to move in and out of higher education more effectively and efficiently.
- Support HEIs in fulfilling their statutory obligation, under section 56 of the Qualifications and Quality Assurance (Education and Training) Act 2012 as amended, to establish procedures for access, transfer, and progression. These procedures should provide for the 'identification and formal assessment of the knowledge, skills or competence previously acquired by learners.

The Framework was supplemented by a series of practical, accessible tools and resources, available in multiple user-friendly formats (digital and hard copy). These were co-created by the Project Management Team and the network of Project Leads, as well as by a range of national and international experts in relevant fields. These tools and resources include:

- Guides for applicants and staff
- Staff training and professional development
- Materials for enterprise: case studies, brochures, etc
- Policy guidance and adaptable templates
- Technical definition for data collection, analytics, and reporting.

https://www.priorlearning.ie/sites/default/files/2022-12/Pilot_Framework_RPL%20in%20HE.pdf

Vocational Education and Training (VET) System

Experience within the VET sector highlights that one of the greatest challenges for RTOs—particularly smaller providers—is the financial burden of developing their own RPL toolkits for each qualification on scope or purchasing expensive non-compliant commercial versions (the cause of many RTO deregistration recently).

To address this, there is a strong case for the development of nationally consistent RPL toolkits. These toolkits would:

- provide consistency and support compliance across the VET system,
- reduce duplication of effort and financial burden on RTOs, and
- increase confidence in the quality and fairness of RPL processes.

Would that be feasible?

The most feasible approach would be for the relevant Jobs and Skills Councils (already operational and responsible for Training Packages) to design and develop these toolkits in consultation with industry. Priority could be given to qualifications in sectors with critical skills shortages.

The toolkits would need to be flexible and cater to different candidate circumstances, including:

- employer-supported candidates,
- candidates without employer support, and
- candidates with partial employer support but without access to workplaces for observation or workplace documents.

The VET sector would strongly welcome access to such nationally developed RPL tools and has been calling for them for some years.

Challenges and Risks Summary

- **HE: No systematic RPL framework exists;** sector capability and assessor training must be established before coordination is feasible. Attempting to implement without this foundation risks inconsistency, credibility issues, and poor outcomes.
- **VET: A nationally consistent RPL toolkit for each qualification is both needed and feasible.** It would improve compliance, reduce costs for RTOs, and enhance candidate access. Jobs and Skills Councils are best placed to lead development, starting with areas of critical skills shortage.

- Risks: The main risk across both sectors is a **lack of trained, capable assessors**. Without addressing this, investment in coordinated RPL systems may not achieve intended outcomes and could waste taxpayer funds.

Summary

A co-ordinated approach that allowed Jobs and Skills Council to develop RPL assessment tools for distribution for RTOs to utilise would be welcomed as this lack of consistency and the heavy investment costs to individual RTOs is inhibiting good RPL practices and processes in the sector.

HE needs to develop a commonality of intent and purpose before RPL assessment tools could be beneficial to such a fragmented sector.

Additional Comments: VET Systems and Practices

In reviewing the report, it appears that *some recommendations have been developed without full reference to the distinct structures, practices, and regulatory settings of the Vocational Education and Training (VET) sector* to that of the Higher Education sector.

To support more effective policy design, I have provided additional information that may help to clarify how the VET system operates in practice and the challenges it faces in delivering national consistent RPL assessments.

RPL Done Well requires:

Understanding the difference in cohorts that will present and the provision of trained RPL assessors to control the process in order to enable:

Employer Supported RPL:

- Assist the employer to identify relevant workplace documents relevant for evidence that may be required
- Assist the Employer to understand the process that will be undertaken
- Create a working relationship with the employer

Non- Employer-Supported RPL:

- Support the candidate by assisting / supporting them to identify what evidence they may have
- Creating RPL assessment strategies such as Challenge Tests, Professional Discussions, Scenarios to create evidence for areas where they have no documents

There will always be candidates that will not fall into the two identified cohorts but be a mixture of both. These candidates may have some employer documents such as Job Descriptions and / or Appraisals but no other documents due to a variety of factors such as personal circumstances e.g. refugees, victims of domestic violence (who have fled their domestic arrangements) or simply unable to pass on workplace documents such as government agencies i.e. police, armed forces, ASIO or consultants (due to privacy or IP issues).

Recognising these individual differences in the RPL process allows the candidate and the employer (where relevant), to feel supported and valued

Required RPL Assessors Attributes:

- Knowledge of their RTO's RPL processes and practices
- Understanding of their responsibility to lead and control the process and not abdicate their responsibilities onto the candidate or employer
- Knowledge of the difference between employer-supported and non-employer-supported RPL
- Skills and knowledge of the process of clustering (of relevant units where appropriate)
- Skills and knowledge on how to map evidence to prove validity and identify where GAP training may be required
- Skills and knowledge of mentoring and communication methodologies appropriate for a broad range of stakeholders
- Current RPL PD such as webinars, micro-credentials, memberships to RPL Communities of Learning/ Practice
- Experience in non RPL assessments (recommended a minimum of 3 years) prior to undertaking RPL assessments, as RPL is considered an advanced assessor skill
- Strong links with industry is preferable to allow for workplace assessment

Current RPL Challenges:

RPL Funding:

Disparity of funding levels from 25% to 80% (per unit cost for a train and assess pathway) across states and territory is not practicable or viable for sustainability for most RTOs (both Public and Independent). RPL requires individualisation according to a person's access to documentation and circumstances. In a significant number of RPL cases a practical observation must be undertaken. Unless the assessor is going out work sites, the RTOs tend to only provide the option for candidate to be assessed is by videoing themselves (which is not a requirement of the unit of competency) and this then pushes costs onto candidates to have the equipment to do this or in some cases travel from afar (and maybe take the day off work) to be challenge tested for practicals on the RTO's premises. An additional cost to the candidate. This discriminates against those who are marginalised by formal education including *Aboriginal and Torres Strait Islander peoples, people with disability, regional and remote learners, women, mature-aged workers, and CALD communities*.

In order to increase access by many marginalised candidates for a variety of reasons – this funding should be allocated to the person applying for the RPL assessment so they can select an RTO (either public or independent) that best services their needs, but paid directly to the RTO after they have enrolled.

Funding for RPL should be 100% per unit at a minimum as RPL is individualised and for RTOs gap training must also be provided where required.

Good Practice RTOs

There are many RTOs across Australia that do RPL well. The common factor that these RTOs have is that they usually have:

- Have strong links with Industry
- Assessors embedded or working on site of the employer (therefore understanding the processes and practices of the employer)
- Trained RPL assessors
- A mindset of flexibility and where assessing can be conducted on a worksite, this should be the first preference of assessment delivery.
- Delivery of training and administrative requirements occur at the worksite i.e. employees are not required to attend a “campus” or formal training venue.

All of the listed RTOs below, meet these requirements. (Note: there are many other great RTOs delivering RPL.)

Insight Training Group Australia Ltd (WA)

<https://training.gov.au/organisation/details/32142/summary>

Delivers 38 qualifications nationally but heavily based in WA (under ASQA) and has strong ties with industry. It employs regional and remote assessors who travel and conduct training and assessments (i.e. students do not need to come to them) delivers AQF 2 – AQF5

Build Design OnLine (NSW)

<https://training.gov.au/organisation/details/45170/summary>

A small boutique RTO that specialises in Drafting and Building Design covering three qualifications across AQF4 - AQF 6

Skills Recognition International Pty LTD

<https://training.gov.au/organisation/details/32373/summary>

This RTO has 26 Qualifications on scope across business and trades AQF2 – AQF 8 and assists international and domestic applicants.

South West Institute of TAFE (Warrnambool Vic)

<https://training.gov.au/organisation/details/3120/summary>

South West Institute of TAFE has 95 qualifications on scope and has embarked on a program over the last few years to get its staff out and working with industry.

Culture Change:

The long-standing expectation that Recognition of Prior Learning (RPL) candidates and students must always adjust to the requirements of Registered Training Organisations (RTOs), rather than RTOs adapting to the needs of industry, is no longer sustainable. In the current climate of workforce shortages, it is neither practical nor productive to remove employees, apprentices, or trainees from their workplaces for extended periods. A more effective and efficient approach is to support training and assessment in the workplace itself. Many forward-thinking RTOs have already recognised this shift, understanding that their role is to serve industry needs, rather than expecting industry to conform to rigid delivery models.

This shift, however, may challenge traditional practices, particularly within TAFEs. While assessors may readily adapt, existing centralised administrative structures—designed largely for internal convenience—have, according to widespread feedback, contributed to cultural and credibility challenges across the TAFE sector nationally.

Government initiatives to strengthen TAFEs are well intentioned, but the unintended consequence has been an increasing trend of industries exploring alternative models. These include developing tailored workplace learning systems, adopting micro-

credentials, and in some cases even considering becoming RTOs themselves. Some employers already contract an RTO exclusively to deliver training to their workforce, recognising the inefficiency of requiring employees to travel or take multiple days away from productive work for block training.

A more sustainable vocational education and training (VET) system requires re-examining this cultural mindset. Instead of investing heavily in new Centres of Excellence—many of which risk rapid obsolescence due to technological change—government policy could support innovative models that embed assessors directly within industry. Such an approach would not only ensure assessors remain current with industry practices, but also reduce the ongoing need for costly infrastructure investment, as training and assessment would leverage industry’s own facilities and technologies.

Summative Recommendation: Draft Recommendation 2.1 : Move to a National system of credit transfer and recognition of prior learning

1. The report overlooks the significant differences between Higher Education and Vocational Education and Training in the Credit Transfer and RPL processes and practices. *Recommendations that treat the two systems as equivalent, risk being unworkable for VET providers and misleading for policy design.*
2. *To ensure equitable outcomes, both VET and Higher Education require consistent national policy, adequate funding for assessor-led RPL, recognition of diverse evidence types, and investment in assessor capability.* Without this, current practices will continue to disadvantage Aboriginal and Torres Strait Islander peoples, people with disability, regional and remote learners, women, mature-aged workers, and CALD communities.
3. *The VET sector already has a national database that is already embedded and effective within the system for many years.*

For higher education, the priority *should not be the creation of a database* but rather **fostering portability, alignment, and cultural change and consensus across the Australian HE sector**, to ensure students can transfer learning without unnecessary duplication. This would strengthen responsiveness, reduce barriers to skills acquisition, and better support the Australian economy.

4. Codifying RPL decisions is not feasible or financially viable within the VET system due to the highly individualised nature of the process, the variability in evidence available, and the declining capacity of the assessor workforce.
5. A co-ordinated approach that allowed Jobs and Skills Council to develop RPL assessment tools for distribution for RTOs to utilise would be welcomed as this lack of consistency and the heavy investment costs to individual RTOs is inhibiting good RPL practices and processes in the VET sector.
6. HE needs to develop a commonality of intent and purpose before RPL assessment tools could be beneficial to such a fragmented sector.
7. Ensure the adequacy and consistency of current funding models for RPL within the VET across Australia.

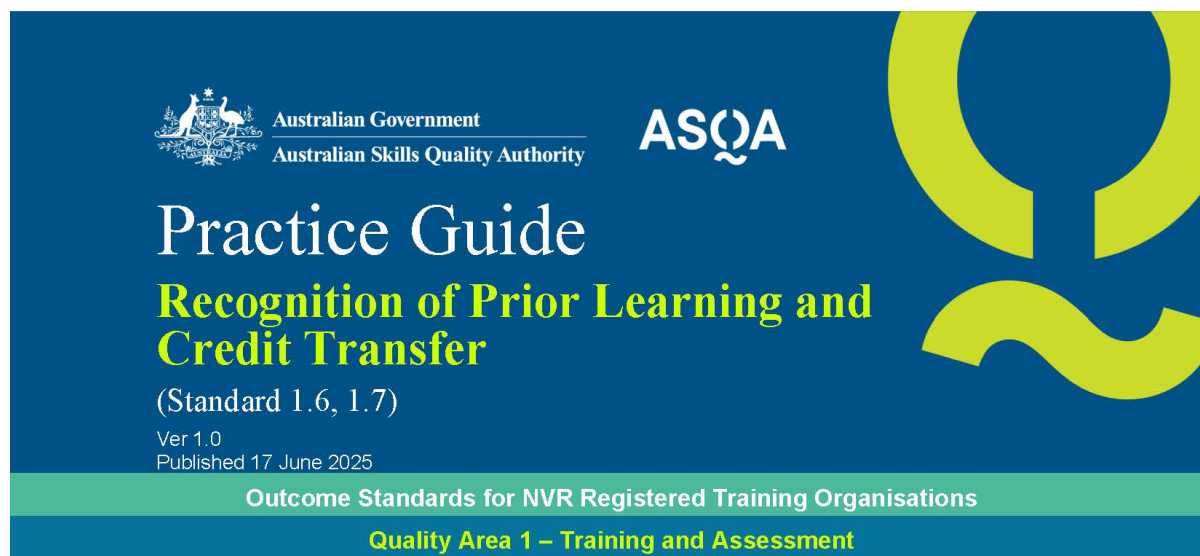
SUPPORTING RPL: IT'S ABOUT GUIDANCE, NOT GATEKEEPING

The best assessors open doors,
not close them.



APPENDIX 1: AUSTRALIAN

ASQA VET



What are the key concepts?

The following key concepts are covered in this practice guide:

Standard 1.6	Standard 1.7
- Recognition of prior learning (RPL) - Evidence of prior learning - Equivalency and currency - RPL assessment	- Credit transfer - Equivalency - Authenticating transcripts

Achieving these Standards in practice

The following table lists examples of activities that may demonstrate compliance with the Standards, as well as risks to mitigate or control. These examples are not a complete list of every activity or risk, nor do all the activities listed need to be completed to achieve compliance. Rather, they are a guide and should be considered within the context, size, scale and student cohorts of your RTO's operations.

Standard 1.6: VET students with prior skills, knowledge and competencies are supported to seek recognition of prior learning to progress through the relevant training product.	
Performance Indicators	Example activities and considerations for compliance
An NVR registered training organisation demonstrates: - VET students are offered opportunities to seek recognition of prior learning and are made aware of the organisation's policies for seeking recognition of prior learning; - decisions relating to recognition of prior learning are based on evidence of prior skills, learning and experience, and are undertaken in accordance with the organisation's assessment system; and - decisions relating to recognition of prior learning are documented and decided in a way that is fair, transparent, consistent amongst VET students, and maintains the integrity of the training product.	- You can demonstrate how your recognition of prior learning (RPL) policies, processes and tools are designed and applied with the same rigour as your assessment system, including that they: - are consistent with, and maintain the integrity of, the training product requirements - ensure currency of evidence provided by the VET student - meet the requirements of the principles of assessment and rules of evidence (Standard 1.4) - result in transparent, defensible and documented decisions. - You can demonstrate how you make students aware of:

	○ their right to have their prior learning recognised (where it is not prevented by any industry regulator or licensing requirements), and ○ your organisation's RPL policy and process. • You can demonstrate how your RPL approach accommodates the variety of experiences and learning pathways that students present. • You can demonstrate how students are made aware of the role any third party will play in their RPL assessment. • You can demonstrate how you ensure that the assessor responsible for assessing the RPL evidence, including those engaged through third parties, meet the requirements of Standards 3.2 and 3.3. • You ensure that your staff understand that granting RPL where the student does not meet the requirements of the training product may have serious consequences for the VET student, and for public safety, industry confidence and the reputation of the VET sector and can demonstrate to ASQA how your policies, systems and processes provide this assurance. • You can demonstrate how you validate and assure your RPL practices and processes to be confident that decisions are being made in accordance with the Standards, and where third parties conduct RPL on your RTO's behalf, you can demonstrate how you monitor and validate the quality of their RPL practices with the same level of rigour. • Where assessment of a VET student's RPL evidence identifies gaps, you can demonstrate how you work with them in relation to the amount of gap training required, how that training will be delivered and any costs associated with it.
	Known risks to quality outcomes • Using inadequate assessment practices or business models that cut corners in issuing RPL which can lead to persons without the expected competencies entering critical roles, including in industries with mandatory qualifications such as aged care, disability services and early childhood education and care. • Promoting RPL as an easy, quick or guaranteed path to qualifications. • Using RPL systems that do not apply the same rigour as the organisation's assessment system, including not upholding assessment record retention requirements. • Making inadequate inquiries with students seeking RPL, or agents seeking RPL on their behalf – for example, not being wary of non-genuine students that may be seeking RPL as a vehicle to facilitate other objectives. • Failing to verify that RPL evidence submitted by students is authentic. • Outsourcing RPL assessments to unregulated third parties that do not understand or apply the Standards to their practices – for example, using

	third parties that do not engage properly qualified or trained assessors. - Failing to ensure RPL assessment practices are robust enough to meet the applicable threshold for high-risk work licencing, where applicable. - Failing to ensure that RPL evidence of overseas qualifications or competencies has been mapped to Australian legislative and regulatory requirements – for example Australian Work Health and Safety legislation or other industry-specific laws. - Failing to robustly assess or test RPL evidence for currency against training package requirements, or against the rules of evidence. - Automatically granting RPL for students that hold a higher AQF level qualification in the same industry. - Having insufficient systems for identifying and addressing a student's RPL gaps.
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Standard 1.7: VET students who have completed an equivalent training product are supported to obtain a credit transfer.	
Performance indicators	Example activities and other considerations for compliance
An NVR registered training organisation demonstrates: - VET students are offered opportunities to seek credit transfer and are made aware of the organisation's policies for seeking credit transfer; - decisions on credit transfer are based on evidence of prior completion of an equivalent training product demonstrated by AQF certification documentation or an authenticated VET transcript (unless prevented by licensing or regulatory requirements or the training product); and - decisions relating to credit transfer are documented and decided in a way that is fair, transparent, consistent amongst VET students, and maintains the integrity of the training product.	- Your policies and processes clearly outline that you provide students with a copy of your organisation's policy for seeking credit transfer, including when and how credit transfer will be administered. - You can demonstrate that you authenticate AQF certification documentation provided by students (including authenticated VET transcripts) in support of credit transfer requests by directly accessing the USI transcript service or by contacting the issuing organisation to verify authenticity. - You can demonstrate that when considering requests for credit transfer, equivalence¹ is clearly evidenced before granting credit. - You can demonstrate that where you do not grant credit transfer because the unit of competency is not deemed equivalent, you provide students with an appropriate alternative pathway, such as RPL.
	Known risks to quality outcomes - Failing to make your credit transfer policy and process available to students prior to enrolment. - Failing to explain to students your rationale if you decide not to grant credit transfer and the

¹ Equivalence may be determined by the following:

- a unit of competency with the current unit code and title
- a *superseded* unit of competency that the training package developer has determined to be equivalent (as published on the National Register)
 - Note: although not required, you may conduct a mapping analysis for units that have been 'superseded equivalent' twice or more to assure yourself that the assessment of competence is still relevant. If you find there is a gap in either the training or the assessment, you may refuse the credit transfer.

	available options to the student such as RPL or gap training. • Failing to check the authenticity of the student's original AQF certification before granting credit transfer. • Issuing a VET qualification or VET statement of attainment via credit transfer based on training wholly completed through RPL or credit transfer at a different RTO. • Failing to consider the contextual elements (e.g. relevant licensed or regulated outcomes) when assessing a student's evidence for credit transfer.
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Self-assurance questions

1	How do you ensure students know about and understand when RPL or credit transfer is a valid option for them?
2	How are you testing the authenticity of evidence supplied by students seeking RPL or credit transfer?
3	How do you ensure that your RPL and credit transfer policies and processes are consistently and rigorously applied?
4	How are you ensuring that staff can recognise when a request for credit transfer becomes a request for RPL?
5	What systems and processes do you have in place to determine RPL and credit transfer, including equivalency?
6	What training do you provide to your trainers and assessors, including third parties, to assist them in managing expectations of students seeking 'easy' RPL or credit transfer?

Page 4 of 4

Standards 2025 Legislative Instrument Definitions

Credit Transfer: Means the process of recognising and awarding credit for prior successful completion of an equivalent unit of competency or module

Recognition of Prior Learning: means an assessment process that involves assessment of an individual's prior learning or experience (including skills and knowledge obtained through formal or informal learning) to determine the extent to which the individual meets the requirements specified in the training product

CATOHR REPORT June 2023: AUSTRALIAN



Australia needs a nationally consistent approach for Recognition of Prior Learning (RPL)

This discussion will focus on the outdated and inefficient recognition of Prior Learning (RPL) practices and process across every state / territory due to the lack of a consistent national standard for the provision of RPL inclusive of funding and access to RPL.

The RPL assessment process is vital to Australia's needs for a skilled and growing economy over the next decade or so. Fair, consistent and robust RPL processes and practices are essential to address areas of skills shortages such as those currently being experienced in health and related industries, manufacturing, defence, transport and logistics, hospitality, construction, civil and mining and many more.

In the following pages we are hoping to build a case through the information provided, for a national approach to RPL.

RPL Assist is a division of Cato HR and has been providing RPL support for over fifteen years to industry, individuals, and Registered Training Organisations (RTOs). RPL Assist is known nationally and internationally as RPL specialists. RPL Assist was the 2nd Place recipient of the VPN (Validation of Prior Learning) Biennale in Germany 2019 for RPL Products

Cato HR and RPL Assist are owned and operated by the Director, Wendy Cato who was most recently was the RPL Specialist on the HSSO National RPL Pilot Project where she designed and developed the Candidate Centred RPL assessment tools as well as designed, developed and delivered the Candidate Centred RPL Assessor training to hundreds of assessors across Australia, involved in the project.

Director Cato Human Resources Pty Ltd
Director of RPL Assist (a division of Cato HR)

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1. ISSUES FOR THE ECONOMY AND SOCIETY

There are many benefits of post-secondary education, but currently the dominate pathway is one where learning is undertaken in formal settings, which denies many participants who are learning outside these formal structures the right to have their skills and training recognised. This leads to an assumption, often noted in research, that Australia has skills shortages. In many cases, we believe this to be incorrect. We only need to look at the recent circumstances with the demands Covid -19 placed on the availability of Personal Protective Equipment (PPE) and other related items, which saw individuals and their employers use and transfer the skills gained from other areas to step up and be able to produce items such as masks and protective gear, ventilators and hand sanitiser with little to no formal training¹.

Likewise, in all areas of Australia, we need our people to be able to shift and adapt their skills, and have those skills recognised in different sectors as needs – and jobs – arise. The challenge for post-secondary education is to establish meaningful Candidate Centred systems and processes that capture informal learning and recognise that such learning takes place in many ways - not just in a classroom – and that increasingly, this is occurring more in the workplace.

It is essential that Australia embraces the right for every Australian to have access to a *fair, compliant, and supported process to recognised skills and knowledge* no matter how it was obtained. In Deb Carr's research 'The RPL Candidate – The Neglected Stakeholder'², she highlights the issues that prevent Recognition of Prior Learning (RPL) from being the socio- economic solution to creating level playing fields for those people within our community who for whatever reason find formal learning difficult and / or challenging. Outlined below is a case study that highlights the potential benefits of using RPL as an economic tool for the transitioning people into the workforce and creating more mobility. The benefits of RPL are identified in the case outlined below.

Case Study

Cato HR has noticed that due to the inconsistencies in RPL processes across Australia, the confidence of RPL of employers and even candidates is probably at an all-time low.

With the numbers of unfilled vacancies continue to rise substantially due to impacts of the Covid-19 crisis and subsequent lack of migration, there must be an investment into other forms of learning recognition to enable people a more efficient pathway into other occupations or industry sectors. A more flexible and consistent process for the recognition of skills and informal learning, such as work based learning would allow for increased mobility and flexibility in the labour market as well as a higher level of 'skilled Australians.'

As an example of 'missing skills in action' I was travelling in a taxi and speaking to the driver, a refugee. On further discussion I noted that he was a Social Worker in his former country. However even though he had great skills that Australia is in desperate need of, he could not gain RPL as he had no paperwork / documentation. He is left to drive taxis to put food on the table for his family. This instance is not uncommon.

Over the years RPL practices across training providers have disintegrated away from anything that is fair or even compliant in many cases, as they have become totally document centred i.e., it is purely a desk audit. No conversion or demonstration of skill required. This is not fair on the Candidate or the nation. In recent times we have seen floods, fire and even earthquakes across our nation which has totally destroyed peoples' belongings including paperwork / documents or even businesses who in the past may have given Third Party Reports.

¹ <https://amtil.com.au/anca-ventilators-covid19-amtil/>

² https://www.researchgate.net/profile/Deb_Carr3

In Canada and in the European Union (EU) a significant number of refugees and skilled migrants are having their skills recognised, which has enabled them to gain meaningful employment while also reducing their reliance on government support, resulting not just in economic and social benefits, but better mental health outcomes³.

This is further evidenced in the UNESCO-UNEVOC paper 'Work Based Learning as a Pathway to Competency Based Education'⁴ which outlines the benefits of work based and RPL Learning.

The issues of not embracing RPL as a meaningful pathway are highlighted in the report by the Settlement Council of Australia: Recognising Overseas Skills and Qualifications. Maximising Human Capital in Newly Arrived Australians⁵

2. ENGAGEMENT WITH INDUSTRY

Cato HR has over 15 years of being involved with Industry Training Advisory Committees and a number of Industry Training Skills Centres. As such, it was a frequent occurrence to work with industries to create meaningful training for potential and current employees. We were involved with many industries assessing experienced employees on the job. We have witnessed training organisations embed trainers and assessors in industries, across a broad spectrum of industrial sectors.

Case Study

Cato HR worked on a large project in South Australia where 200 experienced Riggers and Scaffolders from a broad range of employers were taken through a Candidate Centred RPL process for their Certificate III in either Rigging or Scaffolding. This was undertaken using documents provided by their employers to the assessors, talking to the RPL Candidates about their experiences and conducting observations where required. This saved the Employees having to go off site to train. Workplace documents were collected from the Employer, as well as the Assessor undertaking workplace observations (where required) and oral questions asked by assessors of employees. This makes the whole process more student / candidate centred as many are not into 'schoolie' type environment or assessments.

3. EMPLOYMENT PRIORITY SECTORS

Skills shortages will partly be addressed by the fact that migration will be fast tracked over the next few years, however our current recognition systems are onerous and academically based rather than using the processes of work based 'structured' recognition. This recognition process would also include a prioritisation on RPL to allow for the transition of more workers into other occupations, which in some cases is happening with a large number of exiting Aged Care workers moving into the Disability sector.

Due to the inconsistency of RPL practices across Australian RTOs both private and public, it is highly recommended that immediate consideration be given to the use of national RPL Tools (using a Candidate Centred approach) in those priority sectors. This is so that those industries and RPL Candidates can be confident that they are receiving national recognition for their learning that will not be questionable as to its

³ <https://unesdoc.unesco.org/ark:/48223/pf0000366312.locale=ar>

⁴ Work based learning as pathway to competency based education

https://www.researchgate.net/publication/332414692_Workbased_Learning_as_a_Pathway_to_Competence-based_Education_A_UNEVOC_Network_Contribution Anke Bahl, Agnes Dietzen (Eds.) 2019

⁵ http://scoa.org.au/wp-content/uploads/2019/05/Recognising-Overseas-Skills-and-Qualifications_Maximising-Human-Capital-in-Newly-Arrived-Australians-1.pdf

validity and alignment to the training package requirements. This will also ensure a national consistent approach to assessment, as well as restore confidence in RPL practices. It will also assist ASQA, TAC and VRQA to also apply consistent interpretation of the validity of assessment tools used in a RPL process.

4. ISSUES FOR GOVERNMENT

Funding:

Without getting into the debate of publicly and private RTOs, the reality is the nation needs both in order to deliver a robust skills base as there are some things a private RTO can do in meeting demand that a publicly funded RTO does or cannot.

The current rate paid for RPL assessments by RTOs varies across states ranging from 25% to 70% (some as low as \$2.50 per hour). The low rates in some states paid to RTOs to conduct RPL is making the credibility and reliability of RPL unsustainable. This has led to a significant number of RTOs telling RPL Candidates not to apply for RPL as it is 'too hard.' The RTOs reinforce this concept by using cumbersome, totally outdated RPL processes for anyone that attempts to go through this pathway. An increasing trend is for RTOs to tell people to undertake an Assessment Only pathway. This involves the RPL Candidate being given all the assessments to do, usually with little or no support (reverting back to a desk audit) however these RTOs are claiming (and the system lets them) the same amount as a Learning and Assessment pathway in funding, and yet RPL is an Assessment Pathway, so why is not reimbursed as such?

The amount of funding for RPL assessment, varies from state to state and yet this is a national system. The question must be asked why RPL funding for a Candidate in one state is not the same for an RPL Candidate in another state for the same qualification? In my considered opinion, RPL funding should be set at the same as the Assessment Only pathway levels (which are currently the same as a learning and assessment pathway). This funding should apply to Candidate Centred approaches only – as then RTOs will then be obliged to provide mentoring and support to the Candidate. *This funding should be the same in every state so all Australians are treated equally in this process.*

RPL Process Application:

Inconsistencies in the application of RPL across the nation also occur in relation as to how much RPL recognition the state / territory will allow. In some cases, it is 100% in others the Candidate may only gain 80% of a qualification through an RPL process. The question here again is why can a Candidate in one state can gain 100% recognition for their skills but not a Candidate in another state for the same qualification?

The other question that also arises from this practice is based on the grounds of fairness and true recognition. If a person has been doing their work successfully for years, why can they not be granted a 100% recognition? On what grounds / evidence/ research is the 20% non-recognition based on?

RPL Recognition consistency:

In order to overcome the lack of consistency of RPL practices across Australian RTOs (i.e., each has their own assessments) there must be the addressing of the immediate need for national RPL Tools in priority skill sectors. This would ensure all of those entering or already living within Australia have a reliable and nationally consistent assessment process to ensure the standard of workers to address skills shortages. This process will also require fairness to candidates undertaking the recognition process and less reliance on paper with the implementation of more observations and discussion in the assessment process.

5. CURRENT ISSUES FOR RPL CANDIDATES

Not everyone has a desire to undertake “formal” studies in the traditional format. Many people learn better on the job or by “doing” things rather than through formalised structured learning.

Currently RPL processes and practices are not Candidate Centred which basically means the training organisation abdicates all responsibility for the process and makes the recognition of skills and knowledge the RPL Candidates problem. This is unfair as a candidate knows their job not the assessor’s job. Therefore, it becomes an impossible task for candidates as they receive no support. As such they are funnelled into Learning and Assessment pathways which many find onerous, does not fit their personal situations and they are forced to learn what they already know.

Most RTOs still insist on ‘desk audit’ RPL which means if you have no paperwork / documentation – you can’t get RPL. This lack of documentation may happen for many reasons such as the candidate is a refugee, been subjected to floods, fire or other destructive events and lost them or works in an industry where for security reasons an assessor is unable to even view documentation. The reliance on documentation is unfair to candidates and in many cases a non – complaint process. A Candidate Centred process for a Non-Employer Supported RPL must involve, demonstration of skills through practicals (at the RTO or simulated site) and discussions of what they have done and scenarios (the ‘what if’ circumstances). All discussions should be undertaken orally (and recorded which can be voice to text) as people usually can tell you what they have done better than if they are made to write it. This also stops the most common current practice of giving Candidates and Students knowledge questions to take away, where they can cut and paste answers (reflecting only of their ability to use technology not what they know about their area of work).

International research and reports demonstrate that Candidate Centred RPL models are best practice, but Australia is not using them. This disadvantages not only as us as a nation but also the people who have skills who struggle with the current inconsistent and unfair practices that are currently our national (not so national) RPL system.

It’s time to recognise the importance of recognition!

A national approach is need now!

Appendix 2: HE INTERNATIONAL



Micro-credentials are flexible, agile, and innovative. And still, they face recognition problem. 68% of European institutions see it as a challenge.

At our [hashtag#MCMC2025](#), [Merel Eimers](#) from Nuffic showed her solution: RPL light.

The recognition gap

Traditional recognition needs loads of information. Micro-credentials often don't provide this. Research shows:

- ◆ 25% lack ECTS information
- ◆ Nearly 50% miss learning outcomes data

That's where RPL light steps in.

What's RPL light?

A simplified recognition process that evaluates micro-credentials. RPL light uses 7 criteria:

- ✓ Quality of provider
- ✓ Clarity of learning outcomes
- ✓ Workload information
- ✓ Assessment verification
- ✓ Academic level
- ✓ Testing methods
- ✓ Identity verification

Real-world applications

Universities already use it for:

- ◆ Replacing transition programme requirements
- ◆ Advanced standing in master's degrees
- ◆ Credit exemptions
- ◆ PhD preparation requirements

The beauty? Recognition doesn't have to be all-or-nothing. Small, verified steps can still open doors.

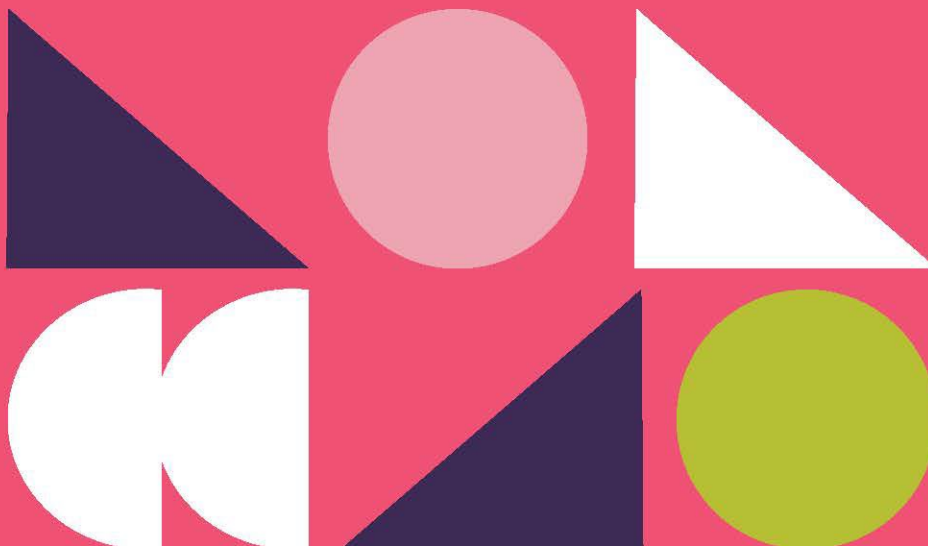
IRISH PROMOTIONS FOR THEIR PROJECT



Recognition of
Prior Learning
Your Learning Counts

priorlearning.ie

Realise your team's
potential with
Recognition of Prior Learning





Recognition of Prior Learning – Making it Work for Your Employees

Recognition of Prior Learning (RPL) recognises that learning takes many forms including 'on-the-job' learning gained through the world of work.

RPL can help employers to address upskilling and reskilling challenges, by recognising the skills, knowledge and experience that an employee has learned in the workplace. It can help to meet existing and emerging skills needs at a faster pace by avoiding duplication of learning.

Other positive impacts include employee retention, and contributing to career progression, whilst boosting knowledge, expertise, and staff motivation.



What is RPL?

It is a process where higher education formally assesses and gives value to the skills, knowledge, and competencies employees have gained outside formal education settings—be it through work experience, in-house training, volunteering, online courses, or life experiences. RPL makes it possible for people to build on the learning they have achieved and to be rewarded for it.



Recognition of Prior Learning
Your Learning Counts

What can RPL be used for?

RPL can be used to gain:

- 01 Entry to courses – i.e. where learners do not meet the standard entry criteria
- 02 Module exemptions/credit
- 03 Advanced entry to programmes beyond year one

Benefits for Employers

- 01 RPL is a driver for workforce development
- 02 Supports staff development and retention within organisations by increasing staff motivation to undertake appropriate education or training
- 03 RPL may help to reduce the amount of time and cost associated with acquiring a qualification or credential
- 04 RPL can be a solution for individuals or cohorts of employees



How does the application process work?

The application process typically has 5 'stages', these are:



1. Information: This is where applicants find out about what RPL opportunities exist in a higher education institution and how the process works.



2. Identification: Applicants are asked to explore their experiences and learning to date with a view to making an RPL application.



3. Documentation: Applicants undertake a reflective process and gather relevant materials to support their application. Some examples of materials may be CVs and job descriptions.



4. Assessment: The application is then assessed by a staff member in the higher education institution. A range of assessment mechanisms may be used including portfolios, interviews, essays or practical/written examinations.



5. Certification: If successful, the learner will receive formal recognition or certification which can lead to:

- I. Credit towards an award or exemption from some programme modules
- II. Advanced entry to a programme
- III. Entry to a programme

In some higher education institutions, RPL may also be used to gain a full academic award. The availability of full awards is at the discretion of each higher education institution.





Evelyn Mc Glynn, Evelyn McMarketing (SME Owner)

"As an SME business owner, RPL has been transformative for me both personally and professionally. The RPL process meant that my skills and experience were recognised, and I could gain access to a degree programme. I was also able to gain module exemptions based on my prior learning, which meant that I could complete the degree faster. Whether it is to upskill or upqualify yourself or your staff, RPL can be an excellent mechanism to do this."

RPL is actively evolving through collaborations among partner institutions. As we embed and improve our approaches, we invite businesses to explore the potential opportunities of RPL.

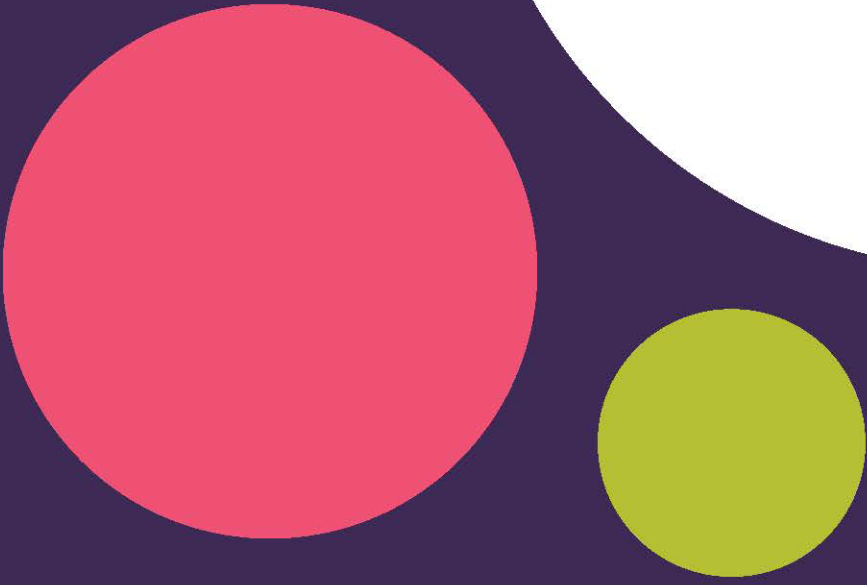
Next Steps

- 01** The National Recognition of Prior Learning Project has 14 partner institutions across Ireland comprising of Technological Universities, traditional Universities, and Institutes of Technology. You can find a list of our partner institutions on the Prior Learning website www.priorlearning.ie
- 02** Each partner institution has an RPL Project Lead who can provide guidance and advice in helping to explore options. Depending on the institution, there may be the potential to develop customised learning solutions using RPL for cohorts of employees, for example where workplace competencies and training are integrated into programme content.



Scan the QR Code to view the full list of our partner institutions.





#YourLearningCounts

The National Recognition of Prior Learning Project is a collaborative initiative working to embed and expand RPL across 14 partner higher education institutions. The project is funded by the Human Capital Initiative Pillar 3 (Innovation and Agility) and co-sponsored by the Technological Higher Education Association and the Irish Universities Association.



Find out what RPL for Enterprise can do for your business

priorlearning.ie
#RPLforEnterprise



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ASQA Practice Guides : Standards 1.6 Recognition of Prior Learning PL & 1.7 Credit Transfer
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