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Ms Danielle Wood
Chair, Productivity Commission

Dear Ms Wood

Five Pillars of Productivity Inquiries: Submission to Building a Skilled and Adaptable Workforce Interim Report

Bond University welcomes the opportunity to respond to the Productivity Commission's interim report on Building a Skilled and Adaptable Workforce. As a private, not-for-profit institution, Bond is committed to delivering high-quality, outcomes-focused education. This submission draws on our institutional experience to provide practical insights into the feasibility and implications of a national credit recognition system, including the challenges and opportunities associated with credit transfer, Recognition of Prior Learning (RPL), and system integration across the higher education sector.

Information Request 2.2 – Establishing a National Credit Database

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

Response:
Bond University acknowledges the intent behind a national credit database to improve transparency and streamline credit transfer processes for students. While the concept has merit, particularly in supporting student mobility and informed decision-making, its practical implementation presents significant challenges that warrant careful consideration.

Our experience suggests that the complexity of credit recognition across institutions is substantial. Even within a single university, managing subject-to-subject, subject-to-program, and program-to-program credit precedents, especially when factoring in specified vs. unspecified credit and their impact on study duration, requires significant administrative oversight. Scaling this across 40 plus institutions, each with distinct credit point systems, program rules, terminologies, and historical subject versions, would be a formidable task.

We understand that a feasibility pilot has been undertaken with New Zealand universities, and early indications suggest integration with existing university systems is being explored. However, the technical and operational demands of such integration are likely to be high. For example, if subject updates in one institution trigger cascading updates across the system, this could result in considerable administrative burden, particularly where minor changes do not materially affect both learning outcomes and an individual's potential for future study success.

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Moreover, the timing of updates is critical. If the central database is updated annually, but institutions like Bond implement subject variations more frequently, discrepancies could arise that affect the accuracy and reliability of credit information.

While we recognise the potential value of a central repository of subject and program learning outcomes, we suggest that the scope of the project be carefully defined. A more targeted approach, such as a national framework for learning outcome comparability or a shared platform for international credential evaluation, may offer greater return on investment and address more pressing gaps in the current system.

2. Could RPL decisions be codified in the database? What are the key challenges?

Response:
RPL is inherently individualised, reflecting the diverse experiences, qualifications, and learning pathways of each applicant. Codifying RPL decisions into a national database would therefore be highly complex and may risk oversimplifying what is, by nature, a nuanced and context-specific process.

That said, there is value in exploring a national RPL framework, similar in structure to the AQF, that could guide institutions in assessing prior learning against consistent criteria. At Bond University, we have developed an internal RPL framework that maps ANZSCO skill levels and years of relevant work experience against AQF equivalencies. This approach has provided a structured and transparent basis for determining credit at both undergraduate and postgraduate levels. However, the absence of national guidelines means that practices vary widely across institutions.

A national framework could support greater consistency and transparency without mandating rigid codification. It could also facilitate the sharing of precedents or case studies, which may be particularly useful for common RPL scenarios. However, any attempt to centralise RPL decisions must account for institutional autonomy, program-specific requirements, and the need for academic judgment in evaluating learning outcomes.

3. What are the major risks of such a database? How could they be mitigated?

Response:
While the intent behind a national credit database is commendable, its implementation carries several significant risks that must be carefully considered and addressed.

The administrative burden on universities could be considerable, especially if the national database offers limited added value given existing institutional systems. Without seamless integration, institutions may face duplication of effort and misalignment between systems, increasing workload and risking discrepancies. Such inconsistencies could confuse students, undermine their decision-making, and create unnecessary stress, potentially making direct engagement with institutions a simpler and more reliable pathway. Additionally, the financial costs of integration, both in terms of technology upgrades and staffing, could be significant, particularly if institutions are required to maintain parallel systems or manually reconcile data across platforms.

A more systemic concern is the potential for the database to unintentionally foster a competitive environment based on credit generosity, where institutions may feel pressure to offer more credit to attract students. While competition in higher education can drive innovation, there is a risk that credit decisions could become overly transactional, rather than grounded in academic judgment and student preparedness. This could lead to students being placed into advanced subjects without the necessary foundational knowledge, particularly if prior learning does not align closely with program requirements.

It is important to emphasise that universities, including Bond, make credit decisions with the primary goal of supporting student success. At Bond, we work hard to maximise the amount of credit a student can receive, recognising the value of prior learning wherever possible. However, we also make deliberate and responsible decisions to ensure students are adequately prepared for the rigours of their chosen program. This involves careful consideration of learning outcomes, curriculum coherence, and progression pathways. The assumption that institutions withhold credit to maximise revenue oversimplifies a complex academic process and overlooks the commitment to student readiness and long-term success.

Finally, the timing and frequency of updates to the database pose operational challenges. If updates are only processed annually, but institutions like Bond University implement subject changes more frequently, discrepancies may arise that compromise the accuracy and reliability of the data.

To mitigate these risks, any national credit database must be developed with:

- Robust integration pathways that minimise duplication of effort;
- Clear governance and academic oversight to preserve the integrity of credit decisions;
- Transparent communication to students about the limitations and context of credit precedents; and
- Flexibility to accommodate institutional differences in curriculum design, credit systems, and update cycles.

The national credit database should also avoid positioning the maximisation of credit as the primary decision driver, as this could compromise academic quality and student preparedness. Credit decisions must continue to prioritise student success, ensuring that recognition of prior learning aligns with program requirements and supports progression.

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

Response:

Coordinating consistent and accurate credit decision data across the higher education sector presents a number of structural and operational challenges. One of the most significant barriers is the diversity of institutional systems, policies, and credit frameworks. Universities differ in how they structure programs, define credit points, and apply rules around specified and unspecified credit. This makes standardisation inherently difficult, particularly when trying to reflect nuanced academic judgments in a centralised format.

From Bond University's perspective, we prefer students to use our own credit calculator. This allows us to present information in a way that is accurate, context-specific, and aligned with our academic policies. It also ensures that students receive guidance that reflects the full picture of their potential credit outcomes, including any caveats or conditions. Additionally, maintaining this process within our own digital environment helps us support prospective students more effectively and reduces the risk of confusion that may arise from comparing credit offers across institutions without adequate context.

Another key barrier is the risk of data duplication and inconsistency. Without robust integration between institutional systems and a national platform, universities may be required to maintain credit data in multiple locations, increasing the likelihood of discrepancies and administrative burden. This is particularly problematic in a dynamic academic environment where subject offerings and program structures are regularly updated.

To support providers in overcoming these barriers, any national initiative should:

- Prioritise interoperability with existing institutional systems to avoid double handling;
- Allow for institutional flexibility in how credit decisions are contextualised and presented;
- Provide clear governance and version control to manage updates and ensure data accuracy;
- Offer technical and financial support for implementation, particularly for smaller institutions with limited resources.

Ultimately, while greater transparency in credit recognition is a worthwhile goal, it must be balanced with the need for academic integrity, institutional autonomy, and a student experience that is both clear and supportive.

Information Request 2.3 – Recognition of Prior Learning (RPL) Assessments

2.3.1 What approaches to RPL assessment are used? What costs are incurred? What is the level of staff involvement?

Response: At Bond University, RPL is managed through a structured but relatively low-volume process. While the number of RPL applications received is modest, each is assessed with care to ensure alignment with academic standards and program requirements.

Our current approach involves a two-stage process. Staff conduct an initial review and provide a preliminary recommendation based on the student's background, which is then referred to the relevant academic for final consideration and approval. While this level of involvement is comparable to assessing a new AQF qualification, the individual nature of RPL applications, often involving unique combinations of skills and experience, means it is difficult to establish precedents. As a result, each new application typically requires the same level of assessment, unlike AQF qualifications where recorded precedents can streamline future decisions.

Given the individualised nature of RPL applications, the process is necessarily resource-intensive, even at a smaller scale. Staff involvement includes administrative coordination, academic review, and in some cases, consultation with subject matter experts.

A coordinated or standardised national approach to RPL assessment could offer benefits in terms of consistency and transparency. However, any such model would need to preserve institutional autonomy and allow for flexibility in how prior learning is evaluated, particularly given the diversity of qualifications, work experience, and learning contexts presented by applicants.

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