Building a skilled and adaptable workforce – Interim report

UAC Submission

September 2025

Introduction

The Universities Admissions Centre (NSW & ACT) Pty Ltd (UAC) was established in 1995 and is the largest tertiary admissions centre in Australia. Our mission is to provide excellence in admissions services and promote equity of access to tertiary education. Central to that mission is a strong culture of servicing the needs of all our stakeholders, in particular our institutions and applicants.

UAC has a trusted and valuable position in the higher education sector. Applicants turn to UAC for unbiased and authoritative information about university admissions and courses and for an easy interface with which to apply. Institutions rely upon UAC services to handle the bulk of the admissions process, allowing them to focus on their core capabilities of learning and teaching, research, and community engagement. Parents, schools, the media, and the public know UAC as their first point of reference for university admissions in NSW and the ACT.

As a not-for-profit working in the broad interests of the education sector, UAC is well-placed to provide objective and neutral advice to the Commonwealth Government and the Productivity Commission.

UAC is therefore pleased to provide the following response to the Interim report, *Building a skilled and adaptable workforce*.

Note

The Interim report, *Building a skilled and adaptable workforce*, has three policy reform areas of interest as follows

– The best resources to improve school student outcomes
– Building skills and qualifications for a more productive workforce
– Fit-for-purpose occupational entry regulations

In this submission, UAC has focused on providing comments on the second policy reform area covering *Building skills and qualifications for a more productive workforce*. Within that policy reform area, UAC is particularly seeking to comment on the Draft Recommendation 2.1 'Move toward a national system of credit transfer and recognition of prior learning (RPL)'.

General comments on UAC, Credit Transfer and Recognition of Prior Learning

The Universities Admissions Centre calculates the ATAR for over 55,000 NSW HSC students every year and processes over 190,000 applications to over 30 tertiary institutions from across Australia, including most domestic undergraduate applications in NSW and the ACT.

Students who enter university immediately after year 12 typically do so based on their school results. For these students, they would not rely on credit transfer or recognition of prior learning.

Students who are a commencing student at university as a non-year 12 student or as a postgraduate student may rely on their school results, work experience, other qualifications or a combination of the above. Many of these students would seek to gain recognition of prior learning to enable them to gain some course credit for their studies.

Students who are looking to move between courses at universities, may seek to gain credit transfer for the work that has already been completed, particularly the further they are into their original course. This would be the case whether the student is transferring within a university, or between universities.

Each post year 12 student and postgraduate student has experience and skills they can put forward as part of their application to study at university. UAC conducts a preliminary assessment based on the agreed criteria from each individual institution. Ultimately, it is up to each institution as to whether it will be considered in determining whether an offer will be made.

Credit, either from transfer or recognition of prior learning is not currently included in the admissions process. Following offer or enrolment, students apply for credit separately to the institution. Students are therefore required to make enrolment decisions without information on if they will be awarded any credit. Students also do not currently have a way to compare what credit they could receive from different institutions prior to enrolment.

For universities, credit assessment processes can be costly, complex and time-consuming, involving different teams, leading to outcomes that are sometimes inefficient and inconsistent. As mentioned, decisions can often take a significant period of time, and may not be finalised until well after the student has commenced studies, impacting potential starting dates for study and/or course selection.

In this context there is significant room for improvement that would benefit students and institutions.

Current platforms such as tertiary admissions centre admissions systems, UAC's Advance credit management system and future initiatives to consolidate sector-wide credit information and securely store and access learner credentials could be integrated to support lifelong learning and increase national productivity.

UAC's Advance software platform could play a significant role in a national approach to recognition of prior learning. Advance is already in-market, with universities across multiple states using it to streamline the assessment of academic credit and RPL, while simultaneously building robust precedent databases. This capability could readily be scaled to a national level utilising Advance, providing a national standard while also maintaining institutions autonomy for decision-making. On the student side, Advance includes an applicant-facing credit calculator, which students are already using to compare and then apply for credit in real time. In doing so, Advance enables an efficient and transparent process for evaluating recognition of prior learning, directly carrying out many of the tasks outlined in Recommendation 2.1.

Building skills and qualifications for a more productive workforce

Comments on the Draft Recommendation 2.1 Move toward a national system of credit transfer and recognition of prior learning (RPL)

The draft recommendation 2.1 Move towards a national system of credit transfer and recognition of prior learning (RPL) is as follows

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.

UAC supports the recommendation and believes it would have benefits for students, institutions, the government and the nation. We agree with Figure 2.1 of the report that shows that benefits of better credit and RPL include lower barriers to learning, reduced duplication of learning and lower educational costs while also seeing greater lifelong learning.

Students would greatly benefit from credit transfer or RPL being assessed before being required to make a decision on enrolment. We have heard instances of RPL taking a year to be assessed. We have also heard of situations where a student applying for credit at two institutions for the same course could have a year of credit difference between those two universities. Neither of these situations are ideal for students.

If a system was in place where students could draw upon a database and know before enrolment if they will receive some credit, this could encourage many more people to apply and undertake courses. Having more citizens undergo lifelong learning has significant benefits to the country. It would greatly benefit students as they will develop greater skills, which enables them to have more enhanced career prospects. The extra skills learned could significantly lift the economy and national productivity.

Having more students undertaking study across Australia is essential if the attainment targets in the Australian Universities Accord are to be met. If these targets such as having 80% of the working age population with a tertiary education by 2050 are to be reached, gains will need to be made by cohorts with lower rates of study such as those who do not undertake study immediately after high school. Improvements with the Recognition of Prior Learning process can help achieve this and unlock a new generation of students for the nation.

The federal government through documents such as the Australian Universities Accord and the Tertiary Harmonisation Roadmap are pursuing a course of harmonisation within the tertiary sector. Students will be able to move more seamlessly between the VET and higher education sectors with a more transparent, consistent and effective credit and RPL system.

With regards to a potential national database of credit decisions, currently, the assessment of RPL has two stages. The first stage is understanding the skills of the applicant, with the second stage being the translation of that to the subjects and courses that the student intends to apply for. Regarding the second stage, a national database of academic decisions would assist in the assessment of credit transfer and recognition of prior learning. Whilst most universities have their own database of academic credit decisions, a national database would also allow credit decisions to be made faster, easier and with greater consistency. Such a national database should build up precedents where over time, students who have the same experience that are seeking to do the same course get the same outcome quickly. An external party such as the ATEC, government, independent body or a tertiary admissions centre could play a major role in such a national credit database.

Such a database could perhaps begin with a staged approach with the building of credit transfer precedents first. A starting point could prioritise a number of key skill areas or entry points to courses that are considered easier to deliver from a credit point of view, or study areas that are national priorities.

It would also be important that any national credit database would be designed first and foremost for the applicant. It should prioritise ease of application for the student, optimal outcomes for the learner and compatibility across providers and jurisdictions. Such a system would support lifelong learning, workforce mobility, and the recognition of diverse learning pathways.

A national credit database would ideally also allow students to draw information from and compare potential credit from multiple institutions before enrolment. This could allow students to potentially select a course which takes less time for them to complete, or offers the best circumstances for them. This would allow students to potentially spend less money studying and get to the post qualification workforce faster. A national database could also reduce duplication, and make the process more efficient if a student was to apply for credit or compare credit at more than one institution.

Regarding the first stage of RPL assessment, looking at the skills of the applicant, a model of coordinated assessments of prior learning, and possibly credit transfers would be of assistance and is also supported. This could work by a national body conducting assessments of the skills and experience that applicants have. It could also occur by allowing existing institutions and providers to assess the skills and experience of students to a more common standard. Either process would allow greater consistency in the assessment of the skills and experience of applicants, which would enable faster and more consistent application of credit.

Comments on 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 current challenges in navigating credit transfer and RPL disproportionately impacts underrepresented students particularly First Nations Australians, students from rural, regional, and remote (RRR) areas, those from low socio-economic (low SES) backgrounds, and students with disability. These students undertake education in a non-linear way much more often than the rest of the population, that is studying across institutions, through vocational and community pathways, or interrupted by personal, financial, or health-related circumstances. It is therefore of paramount importance for the credit and RPL process to be as easy, fair and transparent as possible for students of underrepresented backgrounds.

For each of these underrepresented student groups, the advice that is currently available and the existing credit system itself could be more transparent and easier to find and navigate. As RPL is managed by each institution, the system, process and advice are fragmented, causing confusing and inequity for applicants who are trying to navigate different requirements, documentation standards, timelines, and outcomes often without clear guidance. This lack of simplicity and clarity disproportionality impacts students from underrepresented backgrounds. This would result in many underrepresented students not getting the optimal credit recognition that they deserve, or in some cases, not applying for credit recognition at all.

Making the system provide decisions faster for students, simpler to apply, easier to find information on and more transparent would assist students from under-represented backgrounds. It could also encourage more enrolments from this cohort.

Some specific challenges for each of these underrepresented groups are as follows

- For Aboriginal and Torres Straight Islander people, many possess significant informal, cultural, or community-based learning that may not be easily recognised under fragmented institutional frameworks.
- For RRR students, distances from major institutions may mean they have less access to the support required to navigate the credit and RPL process.
- For low SES students they may lack the resources, time or support network to navigate the credit systems.
- For students with a disability, these students already have a higher administrative load in arranging their education. The additional burden of a complex and long credit process makes it less likely that these students will complete all of the administrative processes available to them.

Consideration could also be given to providing students from underrepresented backgrounds more support to be able to understand what credit they could be eligible for, and how they can best apply for credit recognition.

Comments on Information request 2.2: establishing a national credit database

> *The PC is interested in participant views on the following questions.*
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> *1. Is a national credit database feasible with the current credit data infrastructure?*
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> *2. Would it be possible to codify RPL decisions into the database? What are the key challenges?*
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> *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?*

As previously mentioned, most universities have their own credit database, however infrastructure is institution centric, and a national credit database is not yet in existence. A national credit database would be possible, and ideally an external party such as the ATEC, government, independent body or a tertiary admissions centre could play a major role in its development and operation.

UAC has developed Advance, a software platform which is already in market and could play a significant role in a national approach to recognition of prior learning. Advance is currently being utilised by institutions across numerous states to streamline the assessment of credit and RPL, while building precedent databases. Advance features a credit calculator for applicants and reporting dashboards for the provider and allows for efficient and transparent evaluation of credit.

The conducting of RPL skill assessments by a standard body, or the conducting of assessments to a national standard would be required as a baseline before being able to codify RPL decisions into a national database. Perhaps an approach could be to allow a university to assess a case, which sets a precedent. Then if the national body has assessed someone of that same skills, and they are seeking to get into the same course at that institution, they would be awarded the same outcome. A key challenge of such an approach is it may take a bit of time to build up appropriate precedents, but the national database would build and have more and more benefits over time.

A major risk of such an approach would be cyber security. Housing so much data on a national database would come with its own cyber risks. A strong approach to cyber security and an appropriate amount of resources would therefore be required to protect this national database. Another consideration would be to ensure that universities retain sufficient input in the process to suit their individual processes and academic policies.

Beyond cyber security, having sufficient resources to setup and maintain a national database would also be a key barrier to coordinating consistent credit decisions. If there was a national team conducting assessment of RPL, that would also take significant federal resources. However, such a system could have greater overall productivity and economic benefits to the country.

Another potential barrier would be to ensure that students and universities are satisfied with the process and that the product is improved from what is currently in place. Students would need to get quick, fair and consistent decisions on credit before they enrol.

Comments on Information request 2.3: Recognition of Prior Learning (RPL) assessments

> *The PC is interested in hearing from education providers that have RPL assessment processes.*
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> *1. What approaches are used? What costs are incurred? What level of staff involvement is required?*
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> *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?*

As previously mentioned, students who are school leavers don't require RPL assessment while many applicants who are post year 12 students may need RPL assessment, particular the more work experience they have completed. Each university does manage their own RPL assessment process and makes the decision on how much credit is awarded.

As was covered in other sections of this submission, the first part of the RPL process by universities is to assess what skills and experience the student has, while the second part is seeing how this relates to the subjects within a course. Educational providers currently allocate significant resources in terms of staff and time to assess the RPL credit of applicants to their institutions. Applications can cover numerous teams and multiple people, and can even take up to a year to assess.

There is scope for a centralised or more coordinated approach to RPL assessment and credit awarding, but particularly the first part in terms of skills and experience assessment. A more co-ordinated RPL assessment process could benefit the institution by allowing them to save on resources of RPL assessment. Perhaps a way to start would be to focus on a number of key skill areas or entry points to some courses, and have a co-ordinated approach to those areas.

A co-ordinated process could also benefit students, as it may enable assessment to be cheaper, or be more consistent. It could also be of great benefit if it was able to be delivered before their enrolment.

While such a process has potential benefits, there a multiple challenges as well. It would take a significant amount of time and resources to have a new national body to assess skills or have a new national standard for assessing skills. The body would also have to be nimble and work quickly, to enable RPL to be assessed before a student enrols to study.

Other Comments

The Australian Qualifications Framework's Pathways Policy recommends that credit agreements negotiated between issuing organisations for credit for students towards higher level AQF qualifications in the same or a related discipline, should use the following as the basis of negotiations:

- 50% credit for an Advanced Diploma or Associate Degree linked to a 3-year Bachelor Degree
- 37.5% credit for an Advanced Diploma or Associate Degree linked to a 4-year Bachelor Degree
- 33% credit for a Diploma linked to a 3-year Bachelor Degree
- 25% credit for a Diploma linked to a 4-year Bachelor Degree.
- A centralised approach to RPL could use these recommendations as the basis for giving credit in a standardised and timely manner.

Another area that could see improvements for the credit transfer and recognition of prior learning system is raising student awareness of the process and what their potential options are. This can be improved at all stages of the student learning lifecycle.

During high school, careers advisers could provide additional information not only about admission to initial tertiary study but also about options for potential subsequent movement between completed and partially completed studies, should these situations arise. This is particularly important given the number of students who discontinue or seek to transfer from the course they initially start after Year 12.

Tertiary students could be provided with additional information from their institution to help them navigate transfers and options for further study upon completion of their current course, should these situations occur. The extra advice could give students the confidence to choose another course earlier if they feel they are on the wrong path, and/or prevent them from dropping out of study entirely.

Prospective students in the workplace could benefit from being made more aware of potential credit or RPL available to them at all stages of the lifelong learning journey. This could be done with a joint national campaign involving governments, tertiary admissions centres, institutions and other stakeholders.

UAC would like to thank the Productivity Commission for the opportunity to submit this response. We are happy for this submission to be credited to the Universities Admissions Centre (NSW & ACT) Pty Ltd (UAC).