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Council of Australian
Postgraduate Associations

**Productivity Commission
Interim Report: “Building
a skilled and adaptable
workforce”**

**your national
postgrad voice.**

Compiled with the assistance of the Council of Australian Postgraduate Associations (CAPA) office bearers and their affiliated member organisations.

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Introduction

The Council of Australian Postgraduate Associations (CAPA) welcomes the opportunity to contribute our perspective to the Productivity Commission's interim report on "Building a skilled and adaptable workforce". CAPA is the peak body representing the interests of the over 480,000 postgraduate students in Australia. We represent both domestic and international coursework and research postgraduates. The Council is comprised of 28 university and campus-based postgraduate associations, and collaborates closely with the National Aboriginal and Torres Strait Islander Postgraduate Association (NATSIPA). CAPA carries out its mission through policy, research, and advocacy, communicating the interests and issues of postgraduate students to higher education stakeholders, Federal, State/Territory governments, Opposition parties, and minor parties.

CAPA believes the long-term sustainability of Australia's education and research infrastructure is integral to Australia's continued success in education attainment and delivery.

Substantive Issues

Section 1.2 - AI for Education

With deep uncertainty in international education in the United State of America (USA), as well as broad ranging funding concerns over medical research, coupled with questions about regulatory changes, the USA's position as the premier country for international education is now being questioned. Over the preceding decade, Australia has emerged as one of the leading locations for international education, particularly for prospective students in Asia. Our mature higher education sector, status as a leading research nation, and high living standards, all make Australia an attractive international education nation. We recommend that Australia leverages these advantages to become a regional higher education hub for Asia, that provides long lasting education which supports individuals across their entire career, by moulding individuals with capabilities, rather than individual skills.

According to Frey and Osborne's study of 702 careers from the United States occupational database O*NET, 47% of US occupations are at risk of automation over the next decade¹. The increasing complexity of AI tools has seen rapid AI implementation into the workforce for the purpose of automation, drastically changing the job market. As a result, many suggest that AI tool education must be embedded into higher education to ensure 'job ready' graduates. This is justified by citing that use of AI tools can enhance basic skill acquisition, and knowledge of how to effectively leverage AI tools will be essential to productivity².



Interestingly, according to Google's founder, "AI itself is going to be gone by the time you finish," I.E. The knowledge transfer process (problem identification and communication; knowledge/research development and selection; analysis of context; knowledge transfer activities or interventions; and knowledge/research utilization³) results in the teaching of already outdated AI 'skills'. Moreover, Frey and Osborne's study has more recently been questioned, for the principles and methodology used to determine jobs that can be automated⁵.

Therefore, in order to cement our place as a regional hub for education, Australia must provide quality higher education programs which provide long-term capabilities (guidance on knowledge, skills and attributes) that support an individual throughout their career. This is supported by the President of Singapore Management University, who argues that top university programs educate the whole person with all kinds of moral, attitudinal, social and professional formation. Moreover, to develop a stronger sense of self, inform identities and shape values, university programs must stimulate independence, exploration and experimentation⁵. Consequently, a recent international Delphi study outlines broader personal skills, such as Autonomy, Critical thinking, Self-initiative, Self-efficacy, Agility, Cooperation skills, and Communication competence, rather than specific technical skills⁶.

Reliance on AI tools can negatively impact personal skills, such as critical thinking, and moreover, AI assistants promote the illusion of understanding in learners, rather than genuine skills acquisition⁷. Hence, Australia's pathway to higher education qualification that provide genuine longevity, must focus on a return to teaching fundamental skills, and acquisition of Ed Tech which enables genuine skills learning through oral assessments, practical demonstrations, and portfolios. Furthermore, tools for the detection of AI are required to provide quality assurance over our degrees. CAPA recommends that acquisition of AI based Ed Tech must have these critical aspects of education in mind.

Section 2.1 - National System for Credit Transfer and RPL

Arrangements for credit transfer and recognition of prior learning (RPL) across Australia's higher education system remain inconsistent and lack transparency. In most cases, students are only informed of the outcome of their credit transfer application after accepting an offer of study, creating uncertainty and, in many cases, compelling them to repeat previously completed or equivalent learning. This results in unnecessary duplication, higher student debt, and delays in workforce entry.

These shortcomings disproportionately affect certain groups, especially towards women and primary carers. Returning to study after career breaks are often challenging as they find that their prior study or professional experience disregarded, forcing them to re-enrol in units they have effectively already completed. Similarly, first-in-family and mature-age students, who are more likely to enter higher education through vocational education or

professional pathways, also face challenges in having their experience properly recognised. International students are also significantly affected. Research shows that only around 30 per cent of migrant qualifications⁷ are formally recognised in Australia, significantly below international benchmarks. This means many skilled migrants are required to retrain unnecessarily, despite labour shortages in critical sectors such as health.

The problem extends across a wide range of professions. Internationally qualified nurses have often faced registration processes lasting nine to twelve months, even with decades of clinical experience. From April 2025, reforms will reduce this timeframe to one to six months for nurses with at least 1,800 hours of recent practice in approved comparable jurisdictions⁹. This shows how streamlined, nationally consistent processes can accelerate workforce entry while maintaining standards. By contrast, internationally qualified doctors and pharmacists continue to face lengthy bridging programs and exams before being allowed to practise, slowing entry into already strained health systems. Engineering is another sector where RPL gaps are evident. Engineers Australia has noted that migrant engineers with accredited overseas degrees are often unable to have their qualifications recognised promptly, leaving many underemployed or working outside their field despite critical shortages on the National Skills Priority List¹⁰. Similarly, international law graduates must often repeat large portions of their training through Graduate Diplomas of Australian Law, even when they have practised in common law jurisdictions. In the vocational sector, tradespeople such as electricians and mechanics frequently see their overseas qualifications downgraded, forcing them to retrain in areas where Australia already faces skill shortages¹¹.

Regulatory oversight has also identified systemic risks. The Australian Skills Quality Authority (ASQA) has reported that many providers use inadequate assessment practices for RPL, fail to verify that evidence is current, or do not apply the same rigour to RPL as they do to formal assessments¹². Such inconsistencies undermine the credibility of qualifications and disadvantage students seeking fair recognition of their prior learning. A more consistent and equitable approach is required. Establishing a national database of credit transfer decisions would increase transparency and provide a reference point for both students and providers. Standardising the framework for assessing prior learning, including overseas qualifications, would ensure decisions are fair and predictable. Requiring that RPL and credit transfer decisions be finalised before students accept an offer would also provide applicants with greater certainty when making study choices.

Reform in this area would reduce duplication of learning, lower student debt, and accelerate workforce participation, particularly in high-demand fields such as health, engineering, and the trades. It would also strengthen Australia's position as an attractive destination for international students, by ensuring that overseas qualifications are recognised in a fair, transparent, and timely manner.

Section 3.1 - Remove Excessive Occupational Entry Regulations That Offer Limited Benefits

Several tertiary qualifications presently need additional qualifications for practice, keeping Australians from the workforce whilst saddling them with larger HECS debts. Careers such as law and architecture require additional qualifications and offer good examples of where efficiencies could be made.

If a person is to become a lawyer in Australia, an additional qualification called “practical legal training” is required on top of the base law qualification. According to The College of Law, these courses are intended to provide a “real-world” scenario in which a lawyer can apply their undergraduate knowledge¹². However, this training could be a part of the original undergraduate qualification, so that universities are producing legal practitioners who are workforce ready. Furthermore, practical legal training courses are not cheap at ~\$12,000¹³, which realistically is just another cost the student and the commonwealth has to support. Finally, these qualifications are time sensitive. According to the University of Adelaide, a law graduate must complete their practical legal training within 5 years of completing their undergraduate legal training if they are to remain eligible for admission as a lawyer¹⁴. If this time lapses, additional bridging courses may be required. While not everyone who studies law necessarily becomes a lawyer, the opportunity should be made to students without excessive additional qualifications.

A similar, though more extreme scenario, is true for architecture qualifications. According to the Australian Institute of Architects, only master- and not bachelor-level architecture qualifications are accredited¹⁵. Therefore, if a person is to become qualified as an architect, they are required to complete a three-year undergraduate degree and an additional two-year master of architecture degree. This represents a potentially excessive qualification requirement that could be better delivered by a four-year undergraduate degree or the option for a lesser accreditation to operate as an architect. Finally, entry requirements to some degrees could be reviewed. Presently, several in-demand allied health qualifications require year 12 admission scores that are potentially restrictive to many prospective students (~80-85, depending on jurisdiction). While admission requirements to physiotherapy, occupational therapy, and speech pathology certainly shouldn't be slackened, they could be harmonised across Australia to encourage equal participation.

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