



Productivity Commission | Consultation
response on interim report: *Building a
skilled and adaptable workforce - Chapter
2.*

University of Tasmania Submission

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1. Introduction

The University of Tasmania welcomes the work of the Productivity Commission and values the opportunity to provide feedback on the important topics covered in the interim report. This response focuses primarily on the content and questions provided in chapter two of the report: [*Building a skilled and adaptable workforce*](#).

National credit transfer and RPL reform offer significant benefits but require careful attention to implementation complexity and equity impacts. Success depends on recognising that these are not primarily technical challenges, but complex professional and social processes requiring sustained investment, stakeholder engagement, and ongoing adaptation. National frameworks work best when they enhance, rather than constrain, institutional capacity to serve students effectively.

The University is currently renewing its Credit Framework to enhance student success, ensure academic quality and improve operational efficiency, through development of the Precedent Database. Academic Senate in March 2025 endorsed the high-level direction of the framework based on three core principles: focus on learning outcomes; clear minimum volume of study requirements; simplified credit types. Ongoing stakeholder engagement and system development has followed as this work has been progressed.

The University of Tasmania looks forward to ongoing collaboration with sector partners and government to ensure that national reforms deliver meaningful benefits for all learners. We are committed to sharing our learnings and contributing to the development of a more equitable, adaptable national system.

2. Consultation Questions, Recommendations and Feedback

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?” [Information request 2.1, p. 33]

University of Tasmania feedback:

The University of Tasmania’s commitment to serving regional, remote, and diverse communities has driven significant innovation in addressing equity challenges in credit recognition. Our experience highlights that while many institutions have made strides, persistent barriers remain for many learners. The key barriers identified through the work at the University of Tasmania are outlined below.

Geographic Barriers:

Students in regional and remote areas often face compounded challenges. Given Tasmania is an island state with a dispersed population, most of the University's domestic students are from regional or remote locations. Of the 19,000+ regional or remote student commencements at the University of Tasmania over 2022-2024, approximately 20% were granted some form of credit. This is a substantial cohort that needs to navigate the credit process.

Application processes frequently assume reliable internet access and digital literacy, which cannot be taken for granted, particularly in regional and remote communities. Assessment of some prior learning may be best undertaken face-to-face or through synchronous communication; however, working hours and seasonal work patterns common in regional industries may not align with standard university hours and assessment schedules, and travel may not be possible.

How we engage with students in the context of flexible study arrangements and approaches to assessment are of particular importance to the University of Tasmania.

National frameworks need flexibility around timing and assessment methods in addition to alternatives to face-to-face processes.

These challenges are compounded by the scale of the affected cohort. The University of Tasmania processes over 2000 student-initiated credit applications annually, with assessment outcomes varying significantly in the type and complexity of prior learning. Applications involving formal educational qualifications typically progress more quickly than those requiring assessment of workplace or informal learning, highlighting the additional support needed for comprehensive RPL frameworks.

Cultural Knowledge Recognition Gaps:

Current RPL frameworks often struggle to recognise knowledge and skills that do not fit neatly into Western academic categories. For Aboriginal and Torres Strait Islander students, learning demonstrated through, for example, community leadership, cultural protocols, and traditional land management are highly relevant but can lack clear recognition pathways. Assessment processes need to move beyond cultural sensitivity to genuine cultural competency, including alternative forms of evidence and respect for oral traditions.

Under the current system, Aboriginal and Torres Strait Islander students at the University of Tasmania have been granted credit at similar rates to the overall cohort. This suggests that while access barriers may not be preventing participation currently, we must continue to be mindful of the opportunities for recognising culturally relevant learning to ensure this is maintained or improved.

Work Experience Documentation:

Mature-aged workers and those from small business or voluntary backgrounds frequently possess substantial expertise that is difficult to document through conventional means. Portfolio-based evidence requirements can disadvantage those whose learning is demonstrated through practice rather than paperwork, and time constraints can further limit their ability to compile documentation.

Adult learners comprise a large cohort of the total students at the University of Tasmania, with more than two thirds of commencements aged 20 or older. Of these, around 40% over 2022-2024 commencing students were admitted based on work or life experience, with a little under 20% also being granted credit for prior learning. This represents a substantial cohort of students that must navigate compiling evidence of prior learning to successfully apply for credit.

Notably, of our mature age commencements, only around 1% of the cohort receive credit based on learning obtained and demonstrated through their work experience.

Addressing this gap in work experience recognition is a key priority for the University of Tasmania's revised Credit Framework and Credit Precedent Database. We are committed to ensuring that all relevant learning can be recognised, regardless of its source, while maintaining processes that are user-friendly for applicants and operationally efficient for assessors.

Our approach includes enhanced guidance and training for academic staff on assessing informal learning. We are also developing protocols to convert individual credit assessments of work-based learning into repeatable precedents, enabling more efficient processing of similar applications in future while maintaining assessment quality.

International Qualification Complexity:

Students from culturally and linguistically diverse backgrounds face inconsistent recognition of international qualifications, with significant variation between institutions and assessors. The burden of documentation and translation often falls on the student, and professional experience gained overseas is particularly difficult to validate.

There may also be language barriers in assessment processes that may not accurately reflect competency levels as well as cultural differences in self-advocacy and portfolio presentation that disadvantage students from cultures emphasising modesty.

In terms of those from non-English speaking backgrounds, from 2022-2024 there were 1,089 commencing domestic students at the University of Tasmania that received credit towards their study, 19% of the overall cohort. This is again a substantial cohort of students that must navigate the credit process.

The proportion of overall international students at the University of Tasmania receiving credit is only marginally lower than the domestic cohort at 17%. These international

students are primarily from different cultural and/or linguistic backgrounds increasing the burden on navigating the credit system.

Hidden Barriers for Students with Disability:

Even where accommodations exist, the cumulative impact of navigating complex systems can be significant. Extended timeframes may help, but do not address the energy cost of compiling evidence or the communication barriers that can arise in assessment interviews.

Notably, the proportion of students with disabilities receiving credit at the University of Tasmania is higher than for students that do not report having a disability, at 23% compared to 19%, highlighting the criticality of removing any remaining barriers for people with disability to apply for credit.

Intersectionality and Systemic Issues:

Policy frameworks often address equity groups in isolation, missing the compounded challenges faced by students with multiple characteristics. Inconsistency in assessment standards, costs, and lack of transparency further exacerbate barriers, particularly for those from lower socio-economic backgrounds.

The University of Tasmania has a high cohort of low SES students with around a quarter of domestic commencements from low SES regions. Of low SES students over 2022-2024, 19% have been granted credit for prior learning. However, like the patterns observed with mature-age learners, only a relatively small percentage of credit recognition is based on informal learning with work. This reinforces the observation that students from lower socio-economic backgrounds may face additional barriers in having non-formal or informal learning recognised and potentially missing opportunities to reduce study time and associated costs.

Critical Implementation Requirements:

The University of Tasmania's experience underscores the need for nuanced data architecture, professional judgement in assessment, and sustained investment in assessor training, system development, and student support. National frameworks must accommodate multiple credit types, conditional precedents, and flexible credit allocation, while preserving the professional judgement essential to quality assessment.

Note: Statistical data cited in this response is based on internal University of Tasmania records and may differ from government-derived classifications for some student equity categories due to variations in data collection and classification methodologies.

2.2 Establishing a national credit database

"The PC is interested in participant views on the following questions. 1. Is a national credit database feasible with the current credit data infrastructure? 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?” [Information request 2.2, p. 39]

University of Tasmania feedback:

1. Feasibility with Current Infrastructure

The University of Tasmania’s work in developing a comprehensive Credit Framework and Precedent Database demonstrates that a national credit database is feasible, but only with significant infrastructure investment and careful attention to the diversity of institutional practices.

Our approach to this work at the University of Tasmania has been informed by detailed student and staff feedback which has highlighted the interconnectedness of curriculum governance, staff training, process design, student experience, and technical implementation. Developing our comprehensive Credit Framework has been a significant undertaking within a single institution, requiring substantial investment in systems, training and change management.

The benchmarking and consultation we undertook with the broader sector indicated considerable variation in institutional readiness for these changes. Even where institutions may ostensibly have credit precedent databases in place, there are significant differences in governance expectations, recognition of informal learning, and technical capabilities. This suggests that any move toward a national system would benefit from a structured discovery and change management approach alongside technical implementation, ensuring institutions are supported to participate meaningfully rather than superficially.

Data Quality and Standardisation:

Institutional data systems vary widely in the type and detail of information captured. Credit decisions often rely on tacit knowledge and contextual factors that are not systematically recorded. Historical data may be incomplete or inconsistent, complicating retrospective database population.

A national system will require common terminology, including a consistent national taxonomy for award titles. This work is currently being progressed through TEQSA’s 2025 consultation on the draft ‘Qualifications and Certification’ guidance note, which aims to standardise award titling across the sector. The University of Tasmania supports this initiative and recommends that the outcomes of the TEQSA consultation be integrated into the design of any national credit database. Standardisation of required evidence of prior learning types and integration across diverse home institution technology platforms will also require consideration.

A national working group could assist with realisation of common data standards and provide technical support for institutions to upgrade systems, and the University of Tasmania would welcome the opportunity to participate in this forum.

2. Codifying RPL Decisions

While precedent information is valuable, RPL assessment inherently involves professional judgement and contextual understanding. Codifying these decisions is challenging, particularly for informal and community-based learning. Privacy and commercial sensitivity must also be considered, especially where RPL applications reveal industry-specific knowledge or workplace practices.

Developing national guidelines for RPL documentation and privacy, and providing training for assessors, could help address these challenges.

There are also opportunities to develop common assessment frameworks grounded in resources such as the National Skills Taxonomy and existing AQF and TEQSA guidance on nested courses to provide consistency of assessment approach and criteria. Whilst providing a common structure and terminology for what can sometimes feel a very subjective process, this still allows the flexibility for institutions to undertake their case-based assessments and adapt to changing learning and teaching practices over time.

3. Major Risks and Mitigation

A critical risk in establishing a national credit precedent database is ensuring the system remains responsive to evidence about student success. Institutions must retain the ability to rapidly adjust or revoke precedents if data indicates that certain credit decisions are negatively impacting student outcomes. This requires robust feedback loops, clear governance for precedent review, and safeguards so that neither institutions nor individual academics face negative repercussions when precedents are amended in the interests of quality. The national system should support agile updates to precedents, with transparent processes for communicating changes and tracking their impact on student progression and completion.

The University of Tasmania's experience with development of our new Credit Framework suggests some stakeholders may express concerns that a national database risks driving over-standardisation, potentially reducing the flexibility needed to accommodate legitimate differences in institutional mission, student cohorts, and curriculum design. Additionally, smaller institutions may flag concerns that resource allocation needs for database development and maintenance may disproportionately affect them, and stakeholders within institutions may have concerns about sharing detailed processes outside of their normal teams.

However, we are optimistic that many institutions will also recognise that these are more likely to be perceived than actual risks and that students (and other third parties) are already comparing potential credit outcomes to inform decision-making about choice of

institution and course. Our belief is that the increased transparency across the sector will lift participation rather than limiting it.

In approaching this, the University of Tasmania's experience demonstrates that the most effective approach to facilitating change and institutional cooperation is grounding any reform in detailed student voice and experience data. When changes are clearly connected to improving student outcomes – supported by concrete evidence of current challenges and proposed solutions – this creates compelling motivation for stakeholders at all levels to engage constructively. Designing reforms to address student needs, alongside institutional efficiency, is likely to help institutions move beyond concerns about perceived competitive disadvantage toward collaborative problem-solving. Phased implementation with clear safeguards can also address these concerns while retaining a focus on improving student outcomes.

4. Key Barriers to Data Coordination

The Complexity of Credit 'Rules' Across Institutions:

The University of Tasmania's credit framework development has highlighted the significant variation in institutional approaches that a national database would either need to accommodate or standardise in advance of implementation.

Credit Type Variations:

Institutions use fundamentally different credit categories (e.g., Auto Credit, Exempt Advanced Standing, Designated Advanced Standing, General Advanced Standing) with different grade impacts, minimum volume of study at the home institution requirements, and application rules. A national database must capture these nuanced distinctions rather than assuming uniform "credit granted/not granted" outcomes.

Simplifying and clearly communicating what these different credit types mean to students will be essential for any national system. Current institutional terminology often obscures rather than clarifies student options and requirements. A national database would need to present credit information in a language that enables students to understand both what they might receive and how it might apply to their intended study program, rather than reproducing complex institutional classifications.

Curriculum Structure Dependencies:

Our experience shows that credit decisions can depend heavily on course-specific requirements, which again will currently vary across institutions:

- Maximum credit percentages that vary by the basis of the prior learning (e.g. formal vs informal learning and complete vs incomplete degrees)
- Level requirements (lower/same/higher level restrictions)
- Core versus elective distinctions

- Professional accreditation requirements that override standard rules

Recording Flexibility Requirements:

The University of Tasmania's precedent system demonstrates the need for flexible coding. Precedents must accommodate sufficient detail for both students and staff to interpret how the credit would be applied in the context of their specific course requirements and study plan by providing detail such as "credit for this specific unit" OR "credit as an elective at this level" OR "credit toward this disciplinary component." Clear communication of these concepts will be essential.

Without this level of detail recorded in the national database, credit precedents may be misinterpreted and applied incorrectly. There is also a risk of mismatch between what is communicated in the database and what students actually experience at their home institution. Such discrepancies would negatively impact both student experience and staff confidence in the national database system.

2.3 Recognition of Prior Learning (RPL) assessments

"The PC is interested in hearing from education providers that have RPL assessment processes. 1. What approaches are used? What costs are incurred? What level of staff involvement is required? 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?" [Information request 2.3, p. 39]

University of Tasmania feedback:

1. University of Tasmania Approaches, Costs and Staff Involvement

The University of Tasmania is committed to taking a robust, multi-layered approach to RPL assessment, balancing consistency with contextual flexibility. Our processes include mapping prior learning against unit and course outcomes, increasingly supported by tools such as an *AQF Equivalency Reference Guide* and *Volume Conversion Reference Guide* to aid consistency.

Costs and Staff Involvement:

RPL assessments require significant academic resources for decision-making, and are supported by a central credit team for triage, precedent checking, documentation verification and study plan design. The University receives over 2000 student-initiated credit applications per year and assessment timeframes vary considerably depending on complexity, from simple precedent-based decisions (potentially same-day) to comprehensive portfolio assessments that may require several weeks of academic review and student interaction.

The true cost of quality RPL extends beyond direct assessment time, encompassing professional development, system maintenance, and student support services. Staff require training in evidence evaluation, interview techniques, and workplace learning – expertise that has historically often been developed informally rather than through systematic professional development.

The University of Tasmania's current precedent database contains several hundred active precedents across all academic areas, with new precedents being added regularly as we encounter novel learning combinations and emerging qualifications. The database requires ongoing maintenance to ensure precedents remain current with curriculum changes and professional accreditation requirements.

In addition to student-initiated credit applications, the University of Tasmania has implemented a process for automatically assessing previous and current students for credit eligibility. While there is an administrative cost associated with this process, it significantly reduces the burden on students moving between or articulating to another degree and better ensures that eligible students receive appropriate credit for previous study.

A key focus of the University of Tasmania's work on enrolment transformation – including credit optimisation – has been ensuring holistic integration across student-facing processes. This means considering how credit assessment interacts with admissions, course planning, enrolment, academic advising, and student support services. Rather than treating credit as an isolated administrative function, we've worked to embed it within a comprehensive student journey that includes proactive identification of credit opportunities, streamlined assessment processes, and ongoing support for student navigating accelerated pathways. This holistic approach is an ongoing effort and has required investment in staff training, system integration, and internal identification and codification of best practice across multiple areas.

Precedent Management:

As of August 2025, the University of Tasmania's Central Credit Team holds records of over 3000 active precedents on behalf of academic assessors, with additional records for expired and negative precedents. The database is updated regularly as new learning combinations and qualifications are assessed. All recorded precedents have validity periods. In our new Credit Precedent Database, launching shortly, additional features such as dashboards providing real-time reporting on precedent status, review dates and links to formal agreements, have been developed to support both operational efficiency and quality assurance. Workflows supporting review schedules, as well as traceability codes to assess impact on student success (linking applied precedents to individual student progress and result records) are also incorporated into our new Credit Precedent Database.

Our experience has highlighted that effective precedent management requires not just technological solutions, but sustained investment in professional development for academic staff. Regular training sessions, peer review processes, and clear escalation pathways for complex cases are all required to ensure consistent application of precedents while

maintaining the academic judgment essential to quality assessment. The time investment in this professional development is substantial but essential for maintaining system integrity and staff confidence.

Conditional Precedent Complexity:

Our system records precedents with specific conditions (additional verification requirements, professional learning currency, workplace context requirements). Simpler "approved/denied" categories would miss the nuanced conditions that make precedents applicable and increase likelihood of assessment rework, inappropriate application in courses, or inaccurate prospective credit outcome calculations.

Traceability of Precedent Usage:

Beyond the assessment and application of precedents, it is vital to be able to identify and assess credit that is granted in terms of any impact on student success. To enable this, precedent identification codes are needed to trace application of a precedent against student outcomes.

2. Coordinated RPL Assessment Process

While coordination may improve consistency, it risks reducing the contextual flexibility essential to quality RPL. Multi-provider systems require agreement on standards, cost allocation, quality assurance, and dispute resolution. It will be important to ensure the administrative burden does not outweigh efficiency gains, particularly in complex or specialised areas. Ongoing monitoring, training, and clear accountability frameworks are essential.

To address these challenges, a staged pilot approach could be trialled in areas of high consensus (such as professionally accredited programs where accrediting bodies have already conducted rigorous assessments of learning outcome equivalences), with regular evaluation and adjustment. Working group input, including academic stakeholder perspectives, would be essential to identifying appropriate pilot cases. National professional development programs and shared assessment resources could also support quality and consistency.

However, care must also be taken in terms of the potential for fragmentation of the student's application experience in the design of any pilot as this would be a significant disincentive for institutions in terms of participation.

The most benefit from a coordinated assessment process working across institutions may be derived where there is already strong commonality of practice and limited need for institution specific curriculum knowledge.

Additionally, support for students in self-assessing strength and relevance or prior learning and collating evidence of learning are services that might be provided at a non-institution

specific level (drawing on institutional expectations of evidence and learning requirements) and which could directly benefit both students and institutions.

Identifying Appropriate Starting Points:

The most promising areas for coordinated assessment would likely be those with existing commonality of practice and limited need for institution-specific curriculum knowledge. Examples might include:

- Recognition of specific professional qualifications with national standards
- Assessment of international qualifications against Australian frameworks
- Military service qualifications with standardised competency frameworks
- Industry-standard certifications with clear learning outcomes

Essential Enabling Infrastructure

Systems supporting direct institutional access to national curriculum and student achievement data are essential enablers for any national approach. These could provide immediate benefit to participating institutions even in advance of full implementation, helping to build capability and confidence in coordinated approaches.

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

To better enable credit transfer and RPL, the Australian Government should: • enforce the right to have credit transfer or RPL assessed before the deadline for accepting an offer • develop a national database of academic credit decisions • develop a model of coordinated assessments of prior learning, and possibly of credit transfers. Students could draw on the database to better understand possible tertiary education pathways, making decisions about the allocation of credit more transparent and providers more accountable. The Government should consider a staged approach to establishing the database that begins with compiling credit transfer decisions, before including credit granted from different types of learning, such as micro credentials, 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. [Draft recommendation 2.1, p. 41]

University of Tasmania feedback:

The University of Tasmania supports the Commission's recommendation to move toward a national system of credit transfer and RPL, particularly the proposals to enforce students' right to early decisions, develop a national database, and include diverse forms of learning.

Right to Early Decisions:

We endorse the right for students to receive credit and RPL decisions prior to accepting an offer. This aligns with the University of Tasmania's direction to provide credit outcomes as part of the admissions process, ensuring students have clear information about study duration, costs, and visa implications to inform their decision-making. We support an approach to a national system which, at all levels, is focussed on improving student experience and outcomes.

National Database and RPL Inclusion:

The University of Tasmania strongly supports the development of a national database of academic credit decisions, enabled by cross-institutional curriculum information sharing. It is critical that the framework extend beyond formal credit transfer to include workplace learning, micro credentials, and international qualifications, assessed against nationally consistent standards.

Governance and Equity:

We support the Australian Tertiary Education Commission's role in stewarding implementation, with responsibilities for data quality, consistency, and oversight. National systems must actively address the compounding disadvantages faced by students with multiple equity characteristics, moving beyond standard 'reasonable adjustments' approaches.

Staged Implementation:

We recommend a staged approach, beginning with areas of consensus and building complexity gradually based on evidence of effectiveness. The framework should be designed for future extension to encompass all forms of learning and recognition.

The University of Tasmania would welcome the opportunity to participate in pilot programs or working groups to support the implementation of a national system.

3. Conclusion

The University of Tasmania values the opportunity to contribute to consultation on the interim report, placing a high value on the work covered in chapter two as essential to support our students, their communities and our region into the future.

Our experience shows that success depends on recognising that the topics we are exploring are not primarily technical challenges, but rather complex professional and social processes requiring sustained investment, stakeholder engagement, and ongoing adaptation.

The University of Tasmania looks forward to ongoing collaboration with sector partners and government to ensure that national reforms deliver meaningful benefits for all learners. We are committed to sharing our learnings and contributing to the development of a more equitable, adaptable national system. We welcome the opportunity to be engaged in collaborative planning, and our teams would be pleased to discuss any questions which may arise from the response we have provided.