

Response to the National Skills Passport Consultation Paper

15 FEBRUARY 2024





ABOUT THE REGIONAL UNIVERSITIES NETWORK

The Regional Universities Network (RUN) welcomes the opportunity to make a submission to the "National Skills Passport Consultation Paper".

RUN is a national collaborative group of seven regional Australian universities: Charles Sturt University, CQUniversity Australia, Federation University Australia, Southern Cross University, University of New England, University of Southern Queensland, and University of the Sunshine Coast.

For further information please contact RUN on 0408 482 736 or execdir@run.edu.au.

KEY PRINCIPLE 1: VALUABLE AND USEFUL

1) How would you describe the value of a National Skills Passport?

RUN believes a proposed National Skills Passport (NSP) has the potential to generate considerable value for the majority of those participating or operating within Australia's education/training sector and workforces. However, any dividends arising from the implementation of a NSP are entirely conditional on the integrity of the data managed and verified by the NSP, as well as the need to achieve near-saturation utilisation of the system by all user groups.

In terms of system integrity, standardising the treatment, validation, and level of competency of what is considered a 'skill' (particularly 'soft' skills such as communication, teamwork and interpersonal skills) – as opposed to formal qualifications/licences – has the potential to disengage employer participation if not managed adequately. RUN is also unclear on how the NSP may handle incomplete qualifications (either in-progress, deferred or abandoned) or how it would handle users on work visas or overseas/borderless credentials, for instance.

In terms of achieving near-saturation levels of utilisation of the system, RUN is mindful that equity gaps may emerge between those students/jobseekers who use the system effectively, and those who use it ineffectively or not at all. As the host of the highest proportion of equity students within the university sector, RUN institutions are acutely aware of the additional inherent challenges, and supports required, by many people from underrepresented backgrounds to participate successfully in education and employment. There is a risk that without significant supports and universal participation, the NSP could become an inflexible measure of people's capabilities and may limit opportunities for some job seekers who would be highly capable to perform certain roles but lack the necessary skills credit within the passport.

For Learners

An effective NSP would empower learners by providing a comprehensive record of their skills and qualifications, enhancing their employability, and facilitating further education and career advancement.

An organised roadmap for skills development and evidence of employability has the potential to act as a lifelong career development system for learners. To help achieve this, career and employability training and career management would be an important feature of any effective NSP system.

For learners in the regions, where there are limited learning opportunities and considerable distances between learners, employers, and institutions, it offers enhanced transportability and mobility of prior learning. For learners at dual-sector institutions, it allows learners to move credit and skills more seamlessly between the vocational and higher education sectors. An effective NSP could take away the need to find information to support claims for credit and transfer for learners, but there is a need to ensure that the system is able to recognise diversity and that people with diverse attributes are not disadvantaged.

However, newly graduated students will require concerted persuasion and guidance in how to use the NSP effectively prior to embarking upon career and/or further study journeys. Again, the overall effectiveness of a NSP system will be limited by its uptake amongst learners/graduates.

KEY PRINCIPLE 1: VALUABLE AND USEFUL

For Employers

There is value in enabling employees to accredit and recognise skills gained on the job which then provide a foundation for future employment or study. For students at regional universities (who juggle learning and mid-career employment to a much greater extent than the typical school-leaver cohorts at metropolitan universities) the NSP would be particularly valuable as a way of recognising and accrediting experiential learning.

Overall, the NSP would provide a transparent and valid system to verify the skills of an employee. It would create a single place to store their verified credentials, skills and experience, assisting them to navigate through career changes. It will also seek to provide consistency thresholds for skills attained in Australia. However, there are questions around the potential of the NSP to inadvertently disadvantage groups who have significant (and unverifiable) work and study history outside Australia – for instance, Australian expats, international students, migrants, refugees etc...

For Employers/Business

Employers would benefit from streamlined access to verified skills and qualifications, facilitating more efficient and informed recruitment processes and better matches between job requirements and candidates' capabilities. An effective NSP will also provide employers with benchmarks for employers to evaluate graduates, employees, and job candidates. It could also provide roadmaps for professional and career development within organisations.

For Education/Training Providers

An effective NSP offers providers the benefits of mobility, transferability, and recognition of prior learning for course entry (including the assessment of work experience where it is being used as a basis of admission). Furthermore, the NSP would offer educational institutions valuable insights into the evolving needs of industries and communities, facilitating curriculum development and program improvement aligned to the needs of the employers and regions that RUN institutions serve.

An effective NSP would provide direction to education providers regarding what is delivered by their career development programs and included in their Work Integrated Learning (WIL) strategies. Provided this was derived from a consultative process with education providers, this would promote a need for greater collaboration between education institutions, industry and students. It may force a change in thinking and approach for many education institutions and require some infrastructure to support integrating the requirements of a NSP.

For Governments

The NSP supports policy for employability, upskilling the economy, and developing a dynamic and inclusive labour market by promoting lifelong learning and workforce mobility. An NSP will provide Governments with the ability to set and measure the impact of employability strategies within education providers, and the needs of industry. Given the ever-changing industry and employability landscapes, there would be a requirement for continual review and monitoring of the system. It is important however to ensure a NSP does not leave itself open to evolving into a tool of social engineering for Government to control, or the perception thereof, to preserve its integrity.

KEY PRINCIPLE 1: VALUABLE AND USEFUL

2) From the perspective of an employer:

2a) Do you access and verify skills and credentials for current and potential employees?

Yes, universities access and verify skills and credentials for current and potential employees.

i. How do you currently access, assess and verify skills and credentials?

RUN member feedback indicates that accepted awards and credentials are accessed/verified, but that this process often does not/cannot extend to areas of specific skills.

ii. Does this process differ for international skills and credentials?

The access/verification of international awards and credentials is a different process to those of domestic awards and credentials, but similarly, this process often does not/cannot extend to areas of specific skills.

iii. What cost and time impacts do you currently incur?

RUN member feedback indicates that the access/verification of international awards and credentials is time consuming, as is the reference checks associated with domestic recruitment.

iv. How could a National Skills Passport reduce the cost and time impacts?

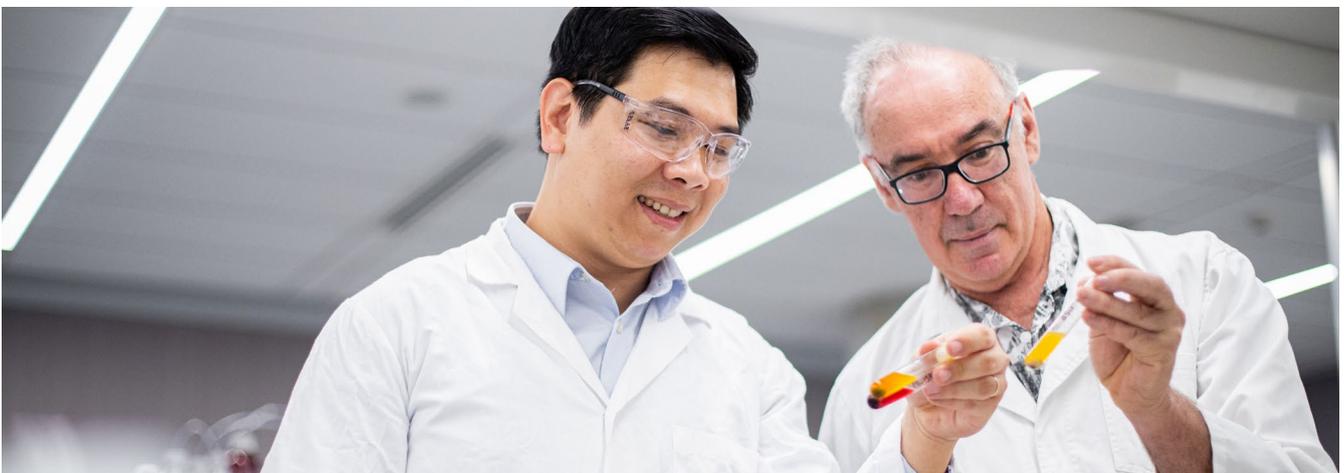
RUN member feedback indicates that for domestic recruitment, the validity and transparency afforded by a NSP would be of great benefit as well as automatic verification/recognition.

2b) Could a National Skills Passport change your current hiring or other practices? If so, what would it need to offer?

RUN member feedback reveals that for some managers responsible for hiring, there is a belief that a NSP can simplify aspects of the recruitment process where certifications and/or qualifications are required. However, for skills-based competencies there are concerns that a NSP may create a divide between those who use the tool effectively and those who do not, with the inclusion/interpretation of 'soft' skills potentially complicating the process. Furthermore, if an organisation's recruitment processes do not change and adapt, or the tool is not fit for purpose a NSP may also create duplication in processes.

2c) What impacts do you anticipate if your organisation starting using a NSP?

RUN member feedback anticipates a streamlining of recruitment processes to result from a NSP, on the presumption that accreditation bodies will participate such that all qualifications/licensing/ accreditation information would be in the one easily-accessible location.



KEY PRINCIPLE 1: VALUABLE AND USEFUL

3) From the perspective of a provider from the education and training sector:

3a) Do you currently access and assess applications for course admissions, recognition of prior learning and credit transfer?

Yes, universities access and assess applications for course admissions, recognition of prior learning and credit transfer.

i. How do you currently access and assess and verify skills and credentials?

Several methods are used: testamurs and transcripts sent by applicants are utilised; qualifications which already exist in-system (i.e. for study completed within own institution); and QualCheck provided by VTAC is utilised to get details for a VET or HE qualification where the student can't/won't provide.

ii. Does this process differ for international skills and credentials?

Broadly as per the above, but with the addition of an assessment of the equivalency of the qualification to the AQF standards, utilising information from the Department of Education International Education system.

iii. What cost and time impacts do you currently incur?

QualChecks for VTAC incur a \$15 fee each and involve a 24 hour turnaround. Pursuing applicants for details can take significant time and effort. Applications can be delayed by up to 8 days, and potentially result in applications being cancelled if suitable documentation is unable to be sourced.

iv. How could a National Skills Passport reduce the cost and time impacts?

There is an opportunity for significant cost and effort savings if information relating to skills and credentials was readily available, and most importantly, verified. It would also simplify the process for applicants, as they will not have to locate and upload this documentation.



KEY PRINCIPLE 2: USER-CENTRED

1) From the perspective of an individual:

1a) How do you currently access and/or share your credentials and skills with education providers, employers and others?

Typically, an individual may utilise a curriculum vitae accompanied by My eEquals, testamurs, transcripts, references (with international qualifications requiring verification).

i. What does and doesn't work well?

The verification process for international qualifications can be time-consuming. For example, my eEquals can have a reputation for being 'clunky' and unreliable, particularly when dealing with HR departments. Testamurs and transcripts are easily shared, however, lack any detail about specific skill-sets. Curriculum vitae and references are established methods but require labour-intensive verifications.

ii. How would you like to see this improved?

A streamlined service to industry and students that is integrated at an institutional and national level, such as that proposed by a NSP system, which ensures accessibility for all social/cultural backgrounds, abilities, life stages, and lived experiences.

iii. Is there a different experience for individuals from different backgrounds – for example, First Nations people, people living in regional Australia or people from non-English speaking background?

RUN institutions well understand the different learning contexts and challenges experienced by students from underrepresented, equity-group backgrounds, and the additional supports required by many students from such backgrounds to achieve tertiary success. Similarly, their successful transition from study-to-workforce often requires nuanced support/guidance as well. The balance between equity and privacy for the kinds of services afforded by a NSP needs to be considered carefully for these equity groups as well.

An effective NSP should accommodate diverse user backgrounds, including those with limited digital literacy or ability to reflect and represent their own learning. While a digital-first design strategy is essential, the design of the NSP should recognise that not all regions or locations are digitally enabled, and not all users are digitally literate, and therefore there should be some aspect of offline functionality (e.g. paper transcripts of the passport).

iv. Is there a different experience for people experiencing economic hardship?

An effective NSP should be designed to avoid any cost barriers to participation or utilisation of the system by its users. RUN members are acutely aware of the role that cost plays in decision-making around study/deferment amongst individuals from low-SES backgrounds.

v. Is there a different experience for individuals experiencing and managing physical and mental health challenges?

An effective NSP should be designed in such a way as that an individual's physical and mental health should not be a preventative barrier to their utilisation/participation in the system.

KEY PRINCIPLE 2: USER-CENTRED

1b) What personalised information, advice or links to services would be helpful to allow an individual to more effectively demonstrate their skills to employers, encouraging further education, upskilling, reskilling and workforce mobility?

The design of a NSP should also consider if/how the successfully completed subjects of an individual's incomplete/deferred study can be used as credit, or used to demonstrate skills/experience/understanding in a workforce setting.

- Ensuring personal details remain up to date (via scheduled prompting).
- Promptly adding new qualifications/skills upon acquisition (automated or manually).
- Identifying gaps in skills for certain areas of interest.
- Evidence-based skills development.
- Career Information.
- Career development.
- Work-integrated learning options.
- Industry mentorship programs.
- Work-experience.
- Career pipeline from high school through lifelong learning.
- Lower-level qualifications (first aid certificates, special drivers' licenses).

1c) What design and accessibility features should be considered in a National Skills Passport?

Consulting with Centre for Accessibility Australia (a disability-led not-for-profit that provides consultation to ensure accessibility for all Australians in the digital environment), or similar consultations with relevant expertise, would be recommended.

Likewise, consideration of factors relating to the digital inclusion of First Nations Australians – particularly those in non-metropolitan Australia – would be recommended (see the Australian Digital Inclusion Index – First Nations, for example).

An NSP-provided template(s), exemplars and 'how -to' guides for developing CVs may be beneficial for users, particularly those entering the workforce for the first time, or mature-aged workers. A consistent CV format would also work in favour of employers.



KEY PRINCIPLE 2: USER-CENTRED

2) From the perspective of an organisation:

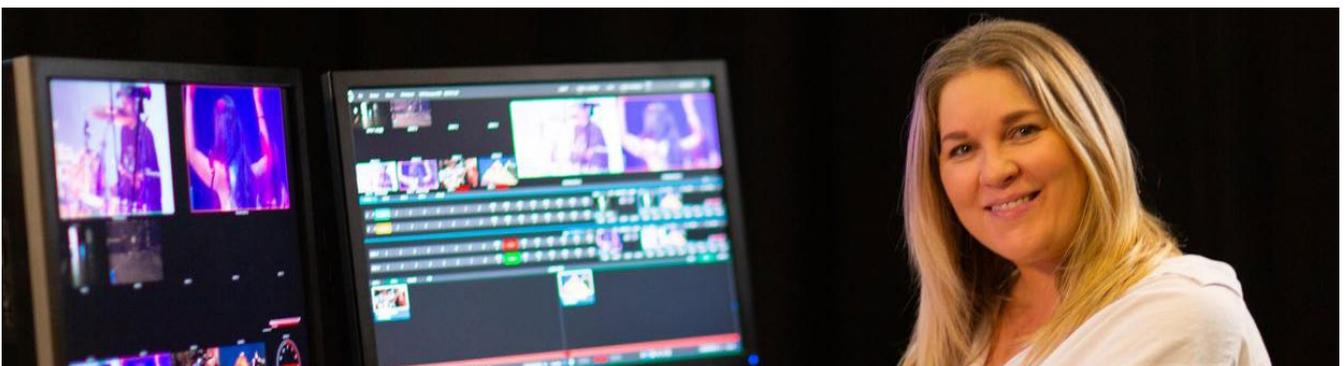
2a) How do organisations access and use credentials when engaging with students, employees, apprentices, or job seekers?

RUN member feedback indicates that accepted awards and credentials are accessed/verified, but that this process often does not/cannot extend to areas of specific skills. For students, testamurs and transcripts sent by applicants are utilised; qualifications which already exist in-system (i.e. for study completed within own institution); and QualCheck provided by VTAC is utilised to get details for a VET or HE qualification where the student can't/won't provide.

2b) What data (such as credentials, qualifications, licences, and skills) and functionality should be included in a National Skills Passport?

The NSP should capture a range of evidence of skills, from formal qualifications to “soft skills” – although considerable thought will be required in certifying soft skills efficiently yet robustly:

- Academic qualifications: Degrees, diplomas, certificates, transcripts, and academic records) obtained from higher education institutions.
- Vocational qualifications: Certificates, statements of attainment, and vocational training credentials acquired through VET providers.
- Digital Badges.
- Industry certifications: Recognised certifications relevant to specific professions or industries, such as IT certifications, professional licenses, and trade qualifications.
- Recognition of prior learning (RPL): Formal recognition of skills and knowledge acquired through work experience, volunteering, or other non-formal learning pathways.
- Evidence of previous experience.
- Professional licenses: Licenses required for practicing in regulated professions, such as nursing licenses, teaching certifications, and engineering accreditations.
- Industry-specific certifications: Certifications demonstrating proficiency in specific skills or technologies, such as project management certifications, occupational health and safety certifications, and language proficiency tests.
- Technical skills: Specific skills relevant to a particular job or industry, such as programming languages, machinery operation, laboratory techniques, or graphic design software proficiency.
- Soft skills: Interpersonal skills, communication skills, problem-solving abilities, teamwork, leadership skills, adaptability, and emotional intelligence.
- Universal Employability Skills (World Economic Forum).
- Transferable skills: Skills applicable across different roles and industries, including critical thinking, time management, creativity, and resilience.
- Language proficiency: Proficiency levels in languages other than the individual's native language, verified through standardized language proficiency tests.



KEY PRINCIPLE 3: INTEGRATED AND INTEROPERABLE

1) What systems do you operate or interact with that may be impacted by a National Skills Passport, and what systems would you like to see integrated?

At a minimum:

- Course Design and Accreditation systems.
- Admissions.
- Credit.
- Student management.
- CRM.
- LinkedIn.
- High School ATAR etc.
- WIL Placement Systems (InPlace, SONIA, others).
- Higher Education Student Record Management Systems and Reporting.
- VET Student Record Management Systems.
- My eQuals.

Regarding My eQuals it is important to highlight that 39 Australian public universities, together with eight New Zealand universities have collectively established the My eQuals platform. This has been a highly successful initiative involving significant investment across all participating institutions, which continues to deliver significant benefits to applicants, students and graduates, participating education providers (Universities and other education providers who have since joined My eQuals) and stakeholders (i.e. employers).

2) What challenges do you currently face aligning information and qualifications across VET and higher education? What do you need to overcome these challenges, and how could a National Skills Passport assist?

Challenges exist when designing credit packages and pathways across VET and higher education. They also exist when assessing credit, taking into consideration admissions criteria, and awarding 'sundry' credit. An effective NSP would streamline credit assessment, ensuring transparency and consistency.

3) Noting the different levels of data standard maturity between VET and higher education, would you see benefit in establishing a single data standard across the tertiary education system? If yes, what features would you expect to see in the data standard?

An integration of systems across the VET and higher education sectors would be a characteristic of any effective NSP. Challenges currently exist in aligning information and qualifications, and as such a single data standard across the tertiary education system would be beneficial. Leveraging existing digital infrastructure and data standards (such as introduced in the Australian microcredential framework and the microcred seeker portal) would be worth consideration. Very different processes (in particular for RPL and articulation pathways between institutions) would be a challenge in implementing a NSP that was genuinely useful by institutions. Features that would benefit from inclusion in a data standard may include:

- AQF Level.
- Volume of Learning.
- Skills classifications.
- Discipline coverage.
- Depth of skill achieved.
- Depth of discipline knowledge achieved.

KEY PRINCIPLE 4: TRUSTED AND RELIABLE

1) Who would you expect to provide the validation? For example, would you expect qualifications to be validated by a university, Registered Training Organisation or regulating body, and skills verified by an employer or third party?

Validation of qualifications and skills by credible sources is paramount to the integrity of any effective NSP. In the case of higher education, this already occurs effectively via the utilisation of My eQuals, whereby documentation issued by the system are verified and can be shared (free of charge) by the student with any third party. Experiential skills verification could involve employers or third-party verifiers according to a process that would need to be designed and managed through a regulatory body. Ideally, an NSP would operate under the general principal that sees individuals managing their data (assisted by clear instructions/guidelines), with education providers and employers verifying qualifications, skills and experience.

Thought would need to be given as to how historical skills and experience being uploaded into an individual's NSP might be validated by employers who have lost records/memory of the interaction, or by employers who are unresponsive to NSP participation.

2) What level of validation of qualifications and skills would you expect from a National Skills Passport? Would you expect more than one level, if so, what can that look like?

Ideally, a NSP might only see one level of validation of qualifications, skills and experience – via education providers and employers, with the process managed through a regulatory body.

3) Do you see value in a National Skills Passport that includes skills and qualifications that are not verified, validated, regulated, or accredited? For example, work experience, unaccredited microcredentials, and industry or other training?

The inclusion of unverified (or unverifiable) skills is a question that needs to be carefully considered. Are skills valid if they cannot be verified? Or is the value of a NSP diminished by the exclusion of unverifiable skills? In either case, what lessons can be learned from NSP's operating elsewhere in the world with regard to the management of unverified skills? As a principal though, an effective NSP should allow an individual to provide as many examples of qualifications, skills and experiences as possible (while still maintaining the integrity of the NSP) as to provide a complete picture of the individual and their employability.

4) What do you see as the role of government in the design, implementation, and operation of a National Skills Passport?

To achieve an effective NSP characterised by its integrity, it must be the Government that fund and manages the platform, integration, and verification systems, free from any real or perceived interference from commercial entities. This principle underscores the effectiveness and integrity of other important national systems such as the Australian Immunisation Register. Design and implementation should be done in consultation with education providers and industry. The Government should also fund and provide guidance and training for NSP users about what should be included in the passport, how to use the passport, and how to manage their data. This process should arguably commence during an individual's secondary schooling, or at the point of being allocated a Tax File Number, or at the point they are provided with a Unique Student Identifier. The government should work collaboratively with education providers and industry about expectations for what is required for inclusion in the National Skills Passport and how it will be evaluated and verified.

KEY PRINCIPLE 5: PRIVACY ENHANCING AND SECURE

1) What privacy, security and fraud protection features would you expect to see in a National Skills Passport? For example, multi-factor authentication, certified by a government agency and verifiable through the system.

Privacy, security, and fraud protection features would be paramount in the design of an effective NSP. Multi-factor authentication and certified verification processes – overseen by Government – would enhance security and instil user confidence/participation.

2) How would you expect third-party access to an individual's National Skills Passport to be managed? For example, would an individual provide one-off access, permanent revokable access, timebound access or another form?

Individuals should have full control over third-party access to their passport, with options for one-off, time-bound, or permanent access. As a default, third parties should be provided with a time-bound one-off token to access data contained within the NSP. Users should also be able to determine what information is shared within the passport and determine government use of their data.

3) For individuals using a National Skills Passport, what does consent look like? At what age should people be able to obtain a National Skills Passport? For example, should it be accessible to secondary students?

There would be value in making the NSP accessible to secondary students as they approach the end of their secondary education. It would make sense that an individual's access to the NSP would begin as soon as they are assigned a Tax File Number – the formal commencement of their workforce participation or when the citizen is provided with a Unique Student Identifier. This allows students to begin documenting their skills, qualifications, and experiences early in their educational journey, empowering them to track their progress, explore career pathways, and make informed decisions about further education and training. Additionally, early access to the passport encourages students to take ownership of their learning and prepares them for future educational and career opportunities. However, the challenge of integrating the NSP across the various State and Territory secondary education systems should be acknowledged.

It will be important to understand how the NSPs advice and guidance about future study will be communicated, particularly as it involves school-aged students - with clarification provided around expectations for all users, and outcomes. There would need to be considerable work undertaken to make sure that expectations are matched from both the student's and the employer's perspectives, and that education providers are aligned with these expectations within program delivery.

