

## **Federation University Submission**

### **In response to the *National Skills Passport: Consultation Paper* (January 2024)**

#### **High-level Responses to the Questions set out in the Consultation Paper:**

##### Key Principle 1: Valuable and Useful

1. In order for an NSP to be useful:

- a. **the administrative or regulatory burden on providers must be minimised** - any NSP should take and maintain provider data in an automatic and seamless way, with as little manual handling as possible. In addition to this, there should be single, streamlined and consistent legislative arrangement between the Commonwealth, state and territory governments for the NSP.
- a. **prior students and existing students who enrolled before implementation should transition to the NSP gradually and with consent**– this should address the administrative burden on providers and any consent or authorisation requirements that need to be obtained to use student data.
- b. **recognition of professional accreditation should be included via opt-in and then properly available to all members** – if a professional body opts in for its licensing or accreditation to be included in the NSP it should automatically apply to every member of that profession unless they opt-out of the NSP.
- c. **the breadth of eligible qualifications should be broad** – this should ensure learners can demonstrate the full breadth of their secondary and post-secondary qualifications, including micro credentials from registered providers, single unit subjects and partly completed qualifications. This should also make prior qualifications and learning easier to recognise for students seeking to resume studying or to transfer between programs, and qualifications are equally visible, consistent and easily understood by employers and providers (“Verifiers”) against the Australia Qualification Framework and any other competency requirements relating to skills.

##### Key Principle 2: User-Centred

2. In order for an NSP to be user centred it:

- a. **should ensure learner and provider participation is broad, inclusive and accessible** – this includes resolving any potential inadvertent consequences if learners or providers

have the option of not participating in the NSP or self-selecting using the NSP – i.e., a learner has difficulty understanding how to use the NSP due to protected attributes (e.g., inclusion in disability, First Nation, or a Culturally and Linguistically Diverse groups), and this is compounded by employers devaluing a learner's qualifications if they chose to not participate in the NSP. Pathways in the NSP to access enhanced support for a student's academic, skills or professional development is critical.

- b. **should also include international student prior qualifications** - if they are, for example, considered by a provider as part of the student's application into the program or otherwise through a separate process administered by the NSP operator to ensure the veracity of the qualification. providing pathways in the NSP for providers to enhance support for a student's academic, skills or professional development.

### Key Principle 3: Integrated and interoperable

3. In order for the NSP to be properly integrated and interoperable it should:
  - a. **avoid duplicative qualification management systems**– in order to be viable and achieve its goal, the NSP must have a clear point of difference to existing service or address its role relative to any other existing systems (e.g., MyEQuals).
  - b. **promote seamless integration of higher education and vocational education and training systems** - Federation University uses separate systems to manage HE and VET student enrolment and qualification data, including administering systems to meet existing data and reporting requirements, such as the Australian Vocational Education and Training Management Information Statistical Standard and Unique Student Identifier. An NSP could support a simpler and more integrated system for all providers. **NOTE:** Federation University would welcome the opportunity to specifically consult on its systems that underly HE and VET student enrolments and qualification management if it assists the development of the NSP.

### Key Principle 4: Trusted and reliable

4. For an NSP to be trusted and reliable, it should:
  - a. **ensure the veracity of qualifications is secure** – the authenticity of any qualifications on the NSP is paramount. Technologies such as blockchain or other protocols should be used to ensure digital qualifications issued to learners are authentic, up to date and secure over time.

- b. **ensure data integrity, privacy and the proper use of data is protected** – personal data must be protected from unscrupulous purposes (e.g., identity theft, data harvesting) and its proper use clearly defined (e.g., limiting access by law enforcement).
- c. **be established, operated and regulated by government** - in particular to ensure it operates in an equitable and accessible way to support all students, including, for example, by: providing a robust NSP legislative framework that integrates into existing regulatory systems, ensuring the NSP is co-designed with providers and Verifiers, conducting regulatory oversight of how providers and Verifiers use the NSP, and operating the NSP's systems.

### **General Commentary**

#### **Federation University supports the development of an effective, accessible and easily administered National Skills Passport (NSP) in consultation with education providers**

5. Federation University is a leading regional university providing high-quality, accessible and relevant post-secondary education through a Co-operative Education Model with industry. This provides regional communities with the highly skilled and empowered workforce to grow and thrive, which is critical to Australia's economic prosperity and progress.
6. An NSP can play an important role in supporting regional community members to pursue education and employment opportunities by providing a practical solution to easily record qualifications in a consistent, secure and standardised way for providers and prospective employers ("Verifiers"). It can also act as a portal to provide learners with more targeted career and education supports.
7. Federation University support is subject to the following recommendations:
  - a. An NSP should be limited to qualifications obtained from registered providers to ensure it is a viable and robust system that allows Verifiers to confirm a learner has valuable and high-quality skills and training. It should not include unaccredited courses or micro-credentials, work experience or training by unregistered providers (e.g., in-house corporate training that is not by a Registered Training Organisation).
  - b. An NSP should be developed in line with complimentary reforms to permit Vocational Education and Training (VET) and Higher Education (HE) qualifications to be more easily offered as dual qualifications. This should progress so that universities with dual-sector

and/or partnership with TAFE can more easily offer self-accrediting innovative and flexible qualifications that efficiently meet VET and HE requirements. This would be mutually beneficial for both initiatives, and ultimately provide benefits to learners and employers (e.g., timely access to a broad and skilled workforce through mixed vocational and high education components that can easily displayed through the NSP).

Federation University's position is based on its leading role as a regional university:

8. Australia must have a properly diversified, thriving and growing economy, and supporting regional communities with the same access to the same educational and workforce opportunities as metropolitan communities is critical to achieving this goal.
9. Federation University supports a well-designed and administered NSP because of the benefits it will deliver to regional learners and businesses, and to arrest the growing education gap, and associated outcomes, with metropolitan communities. An NSP can also increase the value of post-secondary qualifications by be ensuring providing for a clear, and transparent way for qualifications to be used in an inclusive job market.
10. An NSP will also benefit regional community members with upskilling or pursuing lifelong learning, which is key group that Federation University serves in regional Victoria, by allowing learners to easily record and stack qualifications in a consistent, accessible and equal way.