### SUBMISSION



### Submission to the Productivity Commission Interim Report: Building a Skilled and Adaptable Workforce ATN Universities

19 September 2025

Key recommendations for the Productivity Commission's final report: *Building a Skilled and Adaptable Workforce*:

- 1. The Productivity Commission should recommend that Jobs and Skills Australia or the Australian Tertiary Education Commission undertake a staged approach to building a national credit database
- 2. The Productivity Commission should support steps to improve the transparency and quality of recognition of prior learning (RPL) assessments through a long-term project to include RPL in a national database
- 3. The Productivity Commission should recommend industry agencies pilot simple, co-funded financial incentives to increase SME engagement in structured, work-related training, particularly in areas with high productivity relevance such as digital skills, clean energy, and management capability

As Australia's most industry-engaged university grouping, the Australian Technology Network of Universities (ATN Universities) welcomes the opportunity to contribute further to the Productivity Commission's inquiry into building a skilled and adaptable workforce. Our member universities, Curtin University, Deakin University, RMIT University, The University of Newcastle, University of South Australia and University of Technology Sydney, specialise in workforce development, applied research, and global education partnerships.

ATN Universities supports the Productivity Commission's focus on lifting national productivity through improved credit transfer, recognition of prior learning (RPL), and enhanced engagement with small and medium enterprises (SMEs) in training. We support a national approach that improves transparency, portability and efficiency in credit and RPL without undermining institutional self-assurance or imposing one-size-fits-all solutions.

Our recommendations build on ATN member universities' long track record in credit transfer and RPL and align with our broader call for a productivity strategy that is centred on people, skills, and applied innovation. These reforms are not just about administrative efficiency; they are productivity levers. By smoothing learner pathways, speeding recognition of skills, and deepening SME training, Australia can build an adaptable workforce that underpins growth, equity, and resilience.

### 1. The Productivity Commission should recommend that Jobs and Skills Australia or the Australian Tertiary Education Commission undertake a staged approach to building a national credit database

ATN Universities supports a staged approach to building a national credit database, beginning with collection of precedent credit decisions in stable, high-volume foundation and generalist subjects. While variation in credit processes across institutions reflects genuine institutional autonomy and the positive diversity of the sector, it can create friction for learners where systems are opaque or poorly coordinated. The credit database should be developed incrementally. The initial phase should focus on collation and

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publication of credit precedent data to test governance models, interoperability and user value, ideally building from existing trusted networks, such as ATN Universities. This process should rely on opt-in participation, co-designed data standards, and transparent validation processes.

The database should integrate with national digital infrastructure, including the Unique Student Identifier, My eQuals and the National Skills Passport. In particular, policy should build on the work being done to establish a sector-wide credit management initiative under My eQuals, which has the potential to mitigate major issues managing credit and deliver significant benefits to learners, education providers and governments.

Further, any database should integrate with alignment work being done by Jobs and Skills Australia (JSA) on the National Skills Taxonomy, work which ATN member universities have participated in. The Australian Tertiary Education Commission (ATEC) or JSA should lead development and oversight of the database, including setting standards, coordinating data collection, and supporting system-wide harmonisation.

Mandatory credit or RPL assessment prior to offer acceptance is infeasible within current admissions timelines and would risk delays and inefficiencies without clear benefits for students; the Productivity Commission should not recommend this while universities face these constraints.

## 2. The Productivity Commission should support steps to improve the transparency and quality of recognition of prior learning (RPL) assessments through a long-term project to include RPL in a national database

ATN Universities supports improving the quality, consistency and transparency of RPL assessments through better coordination, particularly where it reduces duplication and accelerates skills recognition. Improved RPL will lower barriers for mid-career and equity cohorts, accelerating workforce redeployment in transitioning industries, a key productivity gain.

ATN member universities already conduct RPL through portfolio assessments, workplace evidence and competency testing. National models must accommodate this practice diversity, not seek to impose one-size-fits-all frameworks. Shared assessment formats may be appropriate for select domains, but they must be flexible and co-designed with providers to reflect different levels of study and student cohorts. A national RPL model must support both higher education and vocational education and training pathways, without diluting quality or limiting institutional capacity to maintain standards.

Codifying RPL into a national database is possible, but will require a long-term, phased project involving system harmonisation, data standards, and careful piloting. Pilot projects should focus on areas of existing demand and precedent, such as engineering, health and information technology. Independent evaluation of pilots that consider efficacy will be essential to build confidence among students, providers and employers before scaling up to include more levels of education and more universities. Assessing the benefits for equity cohorts will be especially important to ensure the reforms support more people from underrepresented backgrounds to access RPL and more easily upskill and re-skill.

Key enablers of coordinated RPL reform include: national metadata and classification standards; interoperability across student information systems; and alignment with JSA skills taxonomies, TEQSA and ASQA data and requirements, and professional accreditation frameworks.

# 3. The Productivity Commission should recommend industry agencies pilot simple, co-funded financial incentives to increase SME engagement in structured, work-related training, particularly in areas with high productivity relevance such as digital skills, clean energy, and management capability

ATN Universities supports trialling of simple, co-funded financial incentives to increase SME engagement in structured, work-related training. Incentives should target areas of high productivity relevance, including: digital capabilities; clean energy and sustainability transitions; and management and leadership skills.

Incentives should be broadly accessible, including for sole traders and micro-businesses, with per-firm and per-employee caps to manage program sustainability and limit deadweight loss. While incentives can be implemented quickly, long-term effectiveness requires sustained partnerships between universities, SMEs, and SME industry bodies focused on workforce development and regional growth.

Incentive programs must be designed to support longer-term collaboration, with mechanisms that promote repeat engagement and tailored training design. SME advisory services should be embedded within existing innovation and training ecosystems, including ATN-led university precincts, Trailblazer programs and applied research collaborations. Programs must be simple to access, minimise red tape and include clear, outcome-based evaluation that includes how the programs supported underrepresented cohorts to access training.

Properly designed, these reforms will help SMEs adapt to digital transformation and the net zero transition, driving workforce mobility and national productivity. The Productivity Commission should recommend that operational delivery of pilot programs be led by the Department of Employment and Workplace Relations (DEWR), JSA, or another agency with strong industry linkages to ensure alignment with national skills priorities.

#### Conclusion

ATN Universities appreciates the Commission's efforts to shape a more flexible and responsive tertiary education system. Our member universities stand ready to support reforms that improve learner pathways, better recognise prior learning, and deepen industry-university engagement. We welcome future opportunities to contribute to the final report. ATN Universities stands ready to partner in piloting and scaling these reforms, drawing on our national leadership in credit transfer, applied research, and global engagement.

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