

The University of Sydney, responses to the Commonwealth Government's *National Skills Passport, Consultation Paper*, 18 February 2024

The responses below were submitted to the Commonwealth Department of Education through its online consultation form on 18 February 2024. Further information about the National Skills Passport proposal and the Government's consultations is available through the [department's website](#).

Key Principle 1: valuable and useful

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

Depending on its scope, design, funding model and success of its rollout, the National Skills Passport (NSP) could be of benefit for both learners/employees (**individuals**) and institutions/employers/regulatory bodies (**organisations**). However, these two types of potential users are likely to want very different things from an NSP, which creates tension between the two and makes defining the NSP's scope, then designing and implementing a solution that meets the needs of both groups challenging.

Individuals: learners/employees, will want to curate and control the content and present themselves in the best light for prospective jobs and admissions opportunities.

Organisations: education providers/employers/registration authorities and governments, will want accurate, transactional and unbiased information (qualification documentation, evidence of skills/capabilities/attributes, background employment checks and secondary school results) to inform their decision making.

a. For learners?

The NSP allows me to maintain an independently verified online profile that is trusted by employers and education providers, allowing me to use it as a virtual resume and evidence of prior learning. I can keep it up to date cheaply and easily, share my education and employment history safely and securely with future education providers. The NSP also has the potential to provide a 'one-stop' online location that lets me - throughout my educational and work journey - accurately, validly and securely compare my current qualifications, qualities and skills to those needed for achieving my career goals. This subsequently enables me to access the next educational opportunity that addresses my skills gaps, ensuring I have the necessary skills needed to secure work throughout my career.

b. For employees?

The NSP provides me with a 'one-stop' online location where I can - throughout my life - accurately, validly and securely demonstrate and evidence my prior learning, skills and experiences. The platform enables me to then seamlessly detail my qualifications, skills and experience to current and prospective employers through a single platform. The NSP also removes the need for employers to do separate pre-employment history and background checks on candidates for their jobs, speeding up recruitment times and enabling my movement across the workforce to occur in a timely manner for income continuity.

c. For employers/business?

The NSP provides us with an efficient platform that allows comparison of skills/capabilities/attributes across competing individuals applying for jobs, ideally mapped to skills needed by our sector's workforce. This facilitates fast, cost effective and accurate identification and selection of employable applicants effectively.

The NSP also provides a verifiable and trustworthy online record that negates the need to do pre-employment history and background checks, making it easier, quicker and cheaper to source qualified applicants, speeding up recruitment times, maintaining greater business continuity with turnover of staff and the economy's overall productivity. Ideally, the NSP covers Australian as well as overseas

qualifications and certifications, and links Australia qualifications/certifications to similar systems in place internationally.

d. For providers in the education and training sector?

An online national (at minimum) platform that:

- provides a source of truth for previous studies, admission and credit assessment
- allows prospective students (domestic initially, international long-term) to demonstrate prior learning and achievements for entry to educational programs, including ranking of students
- enables current students to easily and quickly demonstrate prior learning for 'credit' within a course
- provides for efficient presentation of credentials at the conclusion of a course.

e. For governments?

The NSP significantly improves the efficiency and productivity of national, state and territory, and local labor markets. As the NSP grows and proves viable by addressing the needs of individuals and employers, it provides governments and bodies such as the National Skills Commission with rich deidentified data about the Australian population's qualifications, skills and career paths, informing evidence-based research that underpins better policy and improved targeting of scarce resources to maximise outcomes for individuals, employers and the economy.

Q.2 From the perspective of an employer:

a. Do you access and verify skills and credentials for current and potential employees? If yes:

- i. How do you currently access, assess and verify skills and credentials?**
- ii. Does this process differ for international skills and credentials?**
- iii. What cost and time impacts do you currently incur? If applicable, provide details around relevant processes.**
- iv. How could a National Skills Passport reduce the cost and time impacts?**

- Highest qualifications are checked for all external applicants to be appointed as part of our eck process conducted by a third-party provider, [Sterling Check](#) (academic & professional for fixed term and continuing appointments, international and domestic).
- For internal applicants, we do not conduct qualification checks unless they are a requirement for the role or where they are pay impacting i.e. PhD. Internal candidates can also update their qualifications direct into our enterprise HR system - Workday - and [SS&C Technologies](#) verifies/updates their qualifications in system.
- The cost for Australian education checks is currently \$38 per check. Costs are higher for check for overseas qualifications while times taken to conduct overseas checks can be significant.
- Certifications are verified where they are an identified requirement of the role, i.e. CPA, AHPRA etc. No cost to verify but the candidate must supply required documentation.
- An NSP could save time and costs especially if domestic and international checks are available. As we conduct other checks, i.e. police checks, working with children checks, media checks etc, if these aren't included then likely won't save that much time as these still need to be conducted but would save costs.

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

Yes. Depending on NSP's scope, design, funding and operating model, it has the potential to provide an efficient 'one-stop' platform that allows comparison of skills across/between individuals applying for jobs, ideally mapped to skills needed by the sector's workforce, allowing us to identify and select applicants effectively, quickly and cost effectively.

An appropriately scoped, designed, managed, maintained, completely reliable and trustworthy NSP has the potential to negate the need for us to do separate pre-employment history and background checks, making it easier, quicker and cheaper to source qualified applicants.

Defining the scope of the NSP will be critically important. For example, many Australian employers, including higher education providers, recruit substantial numbers of staff with qualifications from overseas institutions. This includes Australian citizens and permanent residents who may have overseas qualifications. Will the NSP capture and verify overseas qualifications, or integrate with international systems? If not, the NSP is unlikely to be able to operate as a 'one-stop' shop from a recruitment perspective for many Australian employers.

c. What impacts do you anticipate if your organisation started using a National Skills Passport?

The impact depends on the scope, design and cost of accessing the NSP, but it could potentially reshape and improve the efficiency of our admissions and recruitment practices as a large higher education provider employing thousands of academic and professional staff.

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

d. Do you currently access and assess applications for course admissions, recognition of prior learning and credit transfer? If yes:

- i. **How do you currently access and assess and verify skills and credentials?**
- ii. **Does this process differ for international skills and credentials?**
- iii. **What cost and time impacts do you currently incur?**

The University of Sydney's Admissions Team assesses all direct applications for places in our Undergraduate, Postgraduate coursework and Higher Degree by Research (HDR (Masters Research and PhD)) programs.

Academic documents from applicants who studied at an Australian university or institution are reviewed against the AQF levels. International qualifications are assessed against the Country Education Profiles (CEPs) from the Department of Education (formerly referred as NOOSR). If a qualification is not available in CEPs, the team conducts additional confirmation through [UK ENIC](#) (the UK National Information Centre for global qualifications and skills).

In terms of academic document verification:

- all applicants (both domestic and international) who have completed a bachelor degree or higher at a university or institution providing official academic transcripts with electronic certification features must ensure that they upload a copy of the secured online document or that they share the document directly from a digital platform (e.g., MyEquals, HEAR, Parchment, MyCreds.ca) before receiving an unconditional offer. This ensures that the Admissions Office can verify the authenticity of such documents, and therefore a scanned hard copy of a transcript will not be accepted.
- All academic documents are only accepted if issued by the relevant office e.g., Registrar Office, Examination Controller Office, Academic Affairs office etc., as applicable by each institution. Documents issued by departments for example, would not be accepted for assessment.
- Applicants who studied in China must provide their degrees in the original language and English translation. All GPA calculation is conducted against both transcripts, which allows us to further check for any discrepancies, and hence assist with additional checks.
- Applicants who studied in India must not only provide consolidated marksheets but must also provide individual marksheets for the degree studied. We have seen a potential increase in fraud for Indian qualifications, and additional checks with the institution are made if we have concerns.

We will also soon be allowing applicants to provide their academic documents directly from [Digitary](#), which provides a digital credential management platform that streamlines the management and verification of academic credentials and certificates and can mitigate the risk of fraudulent activity by guaranteeing the authenticity of academic documents. [Digitary](#) incorporate [MyEquals](#), [Parchment](#), [MyCreds.ca](#) and [MesCertif.ca](#). [China Credential Verification \(CSSD\)](#) verification will also be available and we will use whenever there are any concerns for fraud.

Regarding qualifications, when needed, our Admissions Team verifies that claimed domestic qualifications have been completed at an Australian university or self-accrediting higher education institution, verified in the National Register of providers maintained by the Tertiary Education and Quality Standards Agency (TEQSA).

Other verifications include [Australian Health Practitioners Regulation Agency \(AHPRA\)](#) registration, English tests, [GMAT](#), [GAMSAT](#) amongst others. To be helpful here, for example, the NSP would need to incorporate or link with AHPRA registration and numerous other professional accrediting/registering bodies.

Some of our degrees also require additional credentials, including from overseas. For example, an international applicant can apply to post-registration Nursing courses if they hold a current overseas Nurse registration, which is verified at <https://scfhs.org.sa/en/E-Services/regvaliddescription#>

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

We would expect access to the platform, and for Australian registered tertiary education providers to be able to share a link (permanent access) to approved staff. This will ensure that education providers can further verify information (if needed) and avoid the necessity of re-requesting access. A one-off access is not preferred, since multiple users may be required to access the information at different times.

A tool that incorporates all verified information, both qualifications as well as credentials (professional, healthcare, legal, teaching, memberships) could potentially assist Australia universities in admissions assessments, and minimise time spent across multiple sources. However, this would only be beneficial if the qualifications and credentials in the NSP are up-to-date and verified as genuine.

If implemented, we would like to see the NSP as fully integrated with other systems. For example, if AHPRA registration is confirmed for an applicant, but later the registration is cancelled or conditions are placed on it, this would need to be recorded in and accessible through the NSP.

Defining the scope of the NSP platform will confirm the potential for cost and efficiency impact. For example:

- Would the NPS encompass qualifications from overseas institutions? For example, a domestic applicant who completed a degree offshore? What methods would therefore be used to assess such qualifications, and to verify them?
- How will credentials be defined? For example, Chartered Accountant, academic qualifications, AHPRA registration, legal credentials, membership in professional bodies (Engineers Australia)?
- Would an applicant be able to add credentials from overseas, and if so, how would the verification work? For example, Saudi Nursing registration - <https://scfhs.org.sa/en/E-Services/regvaliddescription#>
- Will non-citizens/permanent residents be covered?

Key Principle 2: user-centred

Q.1 From the perspective of an individual:

- a. **How do you currently access and/or share your credentials and skills with education providers, employers and others?**
 - i. **What does and doesn't work well?**
 - ii. **How would you like to see this improved?**
 - iii. **Is there a different experience for individuals from different backgrounds – for example, First Nations people, people living in regional Australia or people from a non-English speaking background?**
 - iv. **Is there a different experience for individuals experiencing economic hardship?**
 - v. **Is there a different experience for individuals experiencing and managing physical and mental health challenges?**

N/A

b. 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.

- Activities that support people to formulate career goals that align with their values and interests, purpose designed for differing stages of life and career progression.
- Resources on job seeking, resume writing, interview skills (or direct links to commercially available trusted sources of such resources).
- Self-assessment tools to identify learning needs based on career aspirations.
- A portfolio framework that supports users to present evidence that demonstrates skills/capabilities/attributes (credentialled and informal but verified evidence).
- Verified information (both qualifications as well as credentials (professional, healthcare, legal, teaching, memberships)).
- Opportunity to have references uploaded and archived – able to be validated through the platform.
- Automated CV creation, based on portfolio of evidence (CV editable for personalisation).

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

[Universal Design for Learning](#) is a framework designed to improve accessibility and inclusivity of diverse people accessing and engaging educational activities. The NSW Department of Education and the University of Sydney are using this framework which creates a situation where approaches to learning have synergies between the educational levels. Rather than recommending specific features for the NSP, we recommend the use of a clear framework for accessible design. The framework should align with frameworks already used in the education sector for consistency and familiarity for users.

Q.2 From the perspective of an organisation:

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

Regarding access and use of credentials when engaging with prospective students, see our response to Q.3, Key Principle 1.

Regarding access and use of credential when engaging job seekers see our response to Q.2, Key Principle 1.

Regarding current students and graduates:

- A graduate verification is provided via email, moving to MyeQuals in March/April 2024.
- Graduates provide information to potential employers and HE institutions:
 - **Current practice** - accuracy is verified against the University's student records for degree, awarding and conferral dates and specialisations.
 - **Future practice** - information provided by our graduates will be verified against degree name and conferral dates.

Awarding dates and specialisations will still need to be confirmed 'manually'.

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

- Registration/license with professional authorities
- Portfolio framework that can easily be navigated to review evidence of skills/capabilities/attributes (may be formal or informal, breadth of evidence, breadth of media presentation including video evidence demonstrating skill)
- Details if degrees are revoked or accreditation or licenses have lapsed
- Consideration should be given to the start date of the collection, e.g.,
 - All information from x date
 - Degree, specialisations and professional licenses from y date.

As highlighted in response to previous questions, a national and international perspective needs to be considered in design of the NSP. Both in terms of data input as well as individuals who are not Australian citizens or permanent residents accessing the platform.

Key Principle 3: integrated and interoperable

Questions to consider from the perspective of both individuals and organisations:

Q.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?

This is a significant but still incomplete list in terms of the existing systems we interact with that may be impacted by the NSP:

For students: [Digitary](#), [MyEquals](#), [Parchment](#), [MyCreds.ca](#), [MesCertif.ca](#), [China Credential Verification \(CSSD\)](#), [Australian Health Practitioners Regulation Agency \(AHPRA\)](#) registration, Professional association registration platforms, English tests, [GMAT](#), [GAMSAT](#), LinkedIn, UAC, Student Resource Management Systems, Akari/Canvas for individual skills at the degree or course level.

For employees: a range of human resource systems, LinkedIn, Workday.

The NSP must support system vendors to digitally integrate their products into the system, minimising the burden on education providers and employers. A simple example of this is the [ATO Single Touch Payroll Scheme](#), which has been integrated into many financial/accounting products to minimise the administrative effort on employers.

Q.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?

Except for the Australian Qualification Framework (AQF) there are no standards currently in this space, which makes all integrations and interoperability complex and necessarily bespoke. The NSP could promote a common set of standards that would accelerate adoption, ensuring alignment with the AQF and any changes to it that may be in response to the [independent review of the AQF completed in 2019](#).

A perceived challenge to a national IT solution is that each sector/institution works off different definitions. To solve:

- agree definitions and taxonomy/structure of data sector wide
- consult with the vocational and higher education sector, employers and professional accrediting bodies to achieve consistency and meet requirements
- learning from Services NSW's experience with the [Services NSW Digital Wallet](#), the Commonwealth Department of Education with its [MyHealth Record](#) and other relevant systems in Australia and overseas.

Q.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?

The data standard should ensure:

- that there are consistent data definitions, including metadata and taxonomy
- how data are stored, including encryption standards
- how data are exchanged, including transmission and encryption standards.

Key Principle 4: Trusted and reliable

Questions to consider from the perspective of both individuals and organisations:

Q.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?

To have value for the University of Sydney, the records in the NSP would need to be verified by the government (or other trusted party) with capacity built in for direct feeds from educational institutions as occurs with Tertiary Admission Centres, MyEquals and other entities do now. There is no value if students/graduates curate their own content, are responsible for uploading copies of transcripts etc as the risk of fraud are too high. As noted in our responses to other questions the usefulness (and resulting uptake of the NSP) will likely be much stronger if it includes a system for verifying qualifications and registrations that are obtained from overseas.

Q.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?

The education provider type and AQF level at which the skills were achieved:

- TAFE or other vocational providers, university or other higher education provider
- AQF Level 1-10.

Q.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?

Including work experience, unaccredited microcredentials, industry and other training could be valuable, but would depend on scope definition, priorities and resourcing for the NSP. They would all need to be verified as per a standard employment/background check. Volunteering and committee positions, should also be included. Accredited microcredentials should be included in a separate category to unaccredited microcredentials.

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

The Commonwealth Government's role should be to lead the initiative and ensure buy-in from all State and Territory governments, employers and their peak representative bodies and education providers. The Commonwealth may not be the best entity to deliver the product, long-term, but could commission its early-stage development through a transparent, competitive tender process, potentially facilitated through an existing or new statutory authority akin to the [National Digital Health Agency](#). The Commonwealth's investment in the NSP could be recouped down the track through privatisation or introduction of fee-for-service pricing.

The two key sectors in Australia that are funded through public resources are education and health. Similar to the health system, which has government funded eHealth records that enable communication across the sector, the education sector could be further enhanced through a technology platform used by learners, employees, employers and education providers to communicate seamlessly, securely and validly about assured skills of individuals. Similar to health, the Commonwealth, working collaboratively with State and Territory funders of parts of the education system, have a critical role to play in agreeing setting the vision, enabling design and governing the implementation of such a platform.

All industry sectors currently have diverse approaches to evidencing skill attainment. While this is needed for contextual nuances in skills needed by different workforces, shared frameworks that provide a foundation could bring efficiencies in interpreting evidence of skill for learners, employees, employers, and the education sector. The role the Commonwealth, State and Territory governments would be to enable this.

Implementation and ongoing operation (including ensuring perpetual relevance through updates) requires detailed consultation to determine the role of government versus commercial entities.

Key Principle 5: Privacy enhancing and secure

Questions for both individuals and organisations to consider:

Q.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.

From a security perspective:

Individuals: The NSP should be consistent by leveraging existing platforms/services like [myGov](#). Sharing management needs to be simple and transparent including visibility of who has viewed an individual's credentials.

Education providers: Credentials must be tamper-proof and integrations operate in a secure manner using encryption

Minimising data collection obligations for tertiary education providers and having credential information provided by trusted organisations is privacy enhancing. However, in enabling this, it is important to note that Australian universities do already have audit and other requirements to demonstrate that they have performed all appropriate credential checks before a student is admitted.

Currently copies of credentials are kept as ongoing verification, to confirm that necessary checks (particularly as legally required for international student enrolment purposes) have been performed. The records retained for verification purposes are used for regular audit processes (internal and external) and also for internal business investigations.

If universities and other education providers will no longer hold copies of credential documents, the sector will need the NSP to produce a verification record that can be used for subsequent audit and investigation purposes. This will need to document that at a specific date/time, this specific person's qualification in a specific course was verified by NSP. A copy of this verification will need to be retained by the education institution and a copy of the transaction could also be provided to the student, so they have a record of who is verifying their data and when.

Unique identification

In general, use of the NSP, to minimise misidentification or privacy breaches, as many people have the same or similar names, it will be necessary to leverage Unique Student Identifier (USI) or other personal information to ensure that organisations/individuals looking to verify data are actually verifying against the right individual. The service will need to ensure unique student identification.

For the NSP to be trusted, education providers will need to have confidence that they are verifying the right credentials for the right individual. Use of existing authenticated environments, such as the MyGov environment, also help to build environments of authenticated and therefore trusted users.

Requirement to build trust for example through authenticated users and Application Programming Interface (API) gateways

The design of the end-to-end NSP environment needs to build trust in the data it contains and the outputs it generates. For example, education providers and employer will need to trust that the data in the NSP accurate, up-to-date and trustworthy. Students will need to trust that the access of their information by education providers is appropriate and authorised.

To make the environment as easy as possible for all categories of users and as trustworthy as possible, the passport environment will need to be designed for education providers to share trustworthy data at scale, so that they become trusted and authenticated providers of transcript/qualification verification information for their students and graduates.

To enable this, there will need to be highly secure and authenticated data exchange pathways, where the NSP environment can trust that the data being provided is an authenticated transfer from, for instance, the University of Sydney. It will be necessary that for qualifications that include work, study or

professional entitlements (i.e organisations whose input will need to be trusted for significant downstream users/consequence) will need to meet rigorous, defined, organisation specific data transfer requirements through defined and controlled API pathways.

Institutional users looking to query an individual's NSP record, will need different levels of authentication based on their need to query data. For example, university users may be required to query the NSP dataset via secure API gateways. Via these gateways, they may have access to a larger set of available qualifications in comparison to an unaccredited microcredential provider, because universities have larger credential authentication/verification obligations for prospective students than say an unaccredited microcredential provider. For access to NSP data by potential employers, access may be governed by student consent, and they can potentially select the specific credentials (or select all) that they want to share with a prospective employer.

Logging and audit trails

The NSP service should have appropriate logging that documents authenticated data transfers and also the querying of user data, to provide audit and trust to help ensure privacy protection and fraud control.

'5 Safes' model of a trusted environment

The design of the NSP can draw on the [ABS 'Five Safes' model](#) to try to enable safe data sharing and data outputs. Based on this model, the Passport developers can look to create an environment where there is:

Safe data – do this by ensuring the creation of frameworks to ensure the data in the passport environment can be trusted.

Safe people – do this by creating frameworks where all users of the passport can be trusted to be who they purport to be.

Safe settings – do this by designing the Passport environment so actions within it can be trusted and authenticated and so that the only actions that can occur within the system are authorised and appropriate.

Safe outputs – do this by designing any Passport environment outputs so they are trustworthy, auditable, able to be used by universities or employers as trustworthy evidence of credentials.

Safe projects – do this by designing the environment so that passport data can only be used for appropriate purposes. For example, a University with its functions and legal and accreditation responsibilities may have inherently different levels of responsibility and legal obligations and so may be able to perform activities/projects in the environment that a provider with fewer obligations would.

Q.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?

Education providers: One-off access and timebound access may place an unnecessary burden on employers, education providers and students/prospective students/graduates (including loss of job opportunities).

Submission of credentials for a student/graduate should not require formal approval by the individual as this is only to their benefit. Validation of prior learning should be based on revokable permanent access with a view to support lifelong learning and avoid repeated effort.

For accredited qualifications, whether from Australian or overseas institutions, where there may be audit requirements or where there is potential for fraud, education providers may require ongoing access to credential information. However, if a verification record can be generated by the NSP service this might eliminate the need for ongoing access by education providers.

Limited access relies on the creation of a high trust environment, where the quality of the NSP data can be trusted by education providers and employers and where NSP record holders can trust that only authenticated users will be accessing their data for genuine purposes.

Access could be built into some processes for user simplicity. For example, if access rights could be automated and enabled as part of an enrolment application through a credentialed university portal. The NSP solution could be enabled to allow time bound API access to the named student's nominated information, once a formal enrolment has been submitted through an official University portal.

The question of a user's right to remove credentials, either from their NSP record permanently, or to change access settings to remove access for a previously authorised organisation, would need to be considered as part of the development of NSP solution.

Different forms of access for different user types, such as education agents, may also need to be considered to support the university sector.

Employers: One-off access and timebound access will place an unnecessary burden on both the Individual and employer. Revokable permanent access still put the individual in control without the administrative overhead at both ends.

Q.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?

Where there is a legal and necessary basis for education providers or employers to have access to training information, clear end user notification should be built into the process, and access to required information should be automated as part of the job or training application process.

From a privacy perspective, there are likely to be no barriers to the NSP being available to students from high school age onwards. In Australia there is no specific age at which privacy consent is deemed informed, it is more a question of capacity to understand and agree to the proposed information use.

As a control to ensure appropriate protection of minors, there is likely a higher standard of relevance and controlled use and so for younger students, access perhaps could be limited to authorised institutional users based on programs with entry requirements or qualification outputs.

As the program expands overseas, the NSP framework will need to consider different interpretations of consent overseas, such as the explicit parental consent for data collection and use required for people under 18 in India.

Final question, is there anything else you want us to know?

Thank you for the opportunity to provide feedback on the NSP concept, for which the Government has committed \$7.5 million to define the scope of the initiative and develop a business case.

Our understanding is that this proposal was picked up in the [Employment White Paper](#) and [Accord Interim Report](#) in response to strong advocacy from the Business Council of Australia (BCA), of which the University of Sydney is a member.

While we see potential for an NSP to add significant value to the efficient operation of Australia's future education system, its labour markets and economy, the scope definition aspect of the department's current work on the idea is critical and here note the wide range of possible purposes that have proposed for the NSP, including:

- **An authoritative and trusted online skills and qualification storage facility:** "An interoperable skills sharing system to recognise education and skills accrued over a lifetime and collate formal qualifications along with non-accredited training and microcredentials" (BCA to Employment White Paper Consults, Nov 2022)
- **Microcredential and credit recognition:** "Ensure there is a pathway for short courses and microcredentials to be properly recognised, recorded and rewarded. This would include the ability to 'stack' microcredentials within the Australian Qualifications Framework, including by recognising microcredentials in VET, higher education and workplace-based training." (BCA to Accord, April 2023)

- **Support job search, job mobility and lifelong learning:** “A Skills Passport could combine a person’s qualifications across VET and higher education to demonstrate their skills more effectively to employers, help them change jobs and upskill. A Skills Passport could also reduce barriers to lifelong learning and make it simpler for employers to find more skilled workers.” (**Employment White Paper, Commonwealth Treasury, MYEFO 2023-24**)
- **Career navigation:** “A National Skills Passport has the potential to be a practical solution that helps individuals who choose to participate to take the next step in their education or career. They could view, share and assess their skills and qualifications across Vocational Education and Training (VET) and higher education through a trusted and integrated digital system, validated from trusted sources.” (**Department of Education Consultation Paper, January 2024**)
- **Service connection, lifelong learning promotion and personalised career advice:** “A National Skills Passport could connect with other relevant services, make life easier for employers, employees and jobseekers, and promote upskilling and reskilling behaviours to help build a culture of lifelong learning. A National Skills Passport could support personalised tailored career advice and guidance on education, training and career pathways including information on workforce demand.” (**Department of Education Consultation Paper, January 2024**)

The department’s consultation paper mentions successful passport initiatives in Singapore and the European Union. In preparing our submission we looked briefly at both initiatives online, but from the information available were unable to ascertain anything about their success against their respective goals as evidenced by the rate of usage by target individuals, education providers and employers.

The New South Wales Government appears to have had some initial success with its ‘[Digital Wallet](#)’ pilot, most likely because it has been clear about the project’s initial scope; has kept its initial goals modest and simple; has targeted the initiative well to meet the needs of particular groups of workers and employers, and because it has a strong track record in the design and implementation of digital solutions supported by the customer-focused Services NSW.

The BCA’s vision for the NSP appears to be much more ambitious than the NSW Digital Wallet’s, with proposals that the passport will be used for selection purposes (for employment, stacking of micro-credentials within and between education providers, selection of students for degree entry, and recognition of prior learning).

Australia’s Vocational Education and Training and Secondary education sectors both have curriculum and assessment frameworks they work under [the [National Register of VET](#) which outlines units of competency used across all of Australia and the [Australian Curriculum](#) respectively]. The descriptions of educational attainment (ATAR, Units of competency) are comparable across students in different jurisdictions and institutes due to these frameworks. The higher education sector does not have this level of cohesion. Indeed, every self-accrediting university is able to set its own graduate attributes, learning outcomes for degrees, and assessment frameworks (with differing gradings). Interpretation of the educational outcomes (as information stored in the Passport) will therefore be complex for end users unless the platform enables interpretation (e.g. through dashboards and generated GPAs for comparison etc).

No time will be saved for providers if the NSP is simply an archive of tertiary education credentials. Every higher education provider has mechanisms for current and prospective students to upload their credentials and prior learning for review and endorsement. Time and cost savings will only be realised by a NSP if the platform enables ease of comparison. Of note, the NSP could also inadvertently force a new direction for higher education that leads to universities needing to align curriculum and assessment frameworks, which we do not think Australia should pursue. Risks associated with moving in the direction of a NSP need to be thoroughly addressed as a component of the planning process.

In terms of the department’s proposed principles to shape the design of the passport, it is hard to argue with any of the principles on the (valuable and useful, user-centred, integrated and interoperable, trusted and reliable, privacy enhancing and secure) as any NSP will need all of these characteristics. For success, however, the NSP will also need:

- **Clear and realistic goals**, at least in the initiative's infancy, that target a clearly defined problem where it can be demonstrated that there are substantial reliable, valid and secure cost, time and other benefits to be gained for individuals, employers, regulatory authorities and education providers.
- **Adequate and certain funding** (beyond the Commonwealth political cycle) to support the design and implementation of the passport at least to the point of proof-of-concept and pilot testing, as well as mechanisms to ensure the initiative's ongoing financial viability through public and/or commercial means.
- **Strong collaboration and buy-in from all states and territories** across all stakeholder sectors (education and industry), and a commitment from the Commonwealth that the national skills passport will integrate with state/territory-based systems and not duplicate them.
- **Phased implementation**, starting with one (or a small number) of clearly identified problems to demonstrate that the proposed intervention can add value and achieve high rates of uptake for impact, before adding more elements to the passport. This is the approach the NSW Government appears to have taken with a phased rollout of the Digital Wallet through the Services NSW app, and which appears to be working relatively well to meet the needs of its target customers.
- **Recognition that Australia's labour market, employers and education providers operate in increasingly globalised markets**, with rapid advances occurring in the online platforms that any intervention like the proposed NSP will inevitably need to compete with, or need to interact with securely. Given this reality, the Commonwealth should only get involved directly in funding and delivering a NSP if it is proven that it is market failure that is preventing the private sector from developing a digital solution to the problems identified by the BCA. One option could be for the Government to run a competitive tender process for the initial design and implementation of the NSP, with a view to privatising the business once it has reached critical mass and commercial viability.

We trust our feedback is helpful and are keen to assist the department with this project in whatever ways may be helpful and fall within our areas of expertise and experience. For example, we would be could work with the department to host a roundtable with expert staff from NSW universities' admissions, recruitment, ICT, data and privacy, legal and policy teams, if that would of interest.