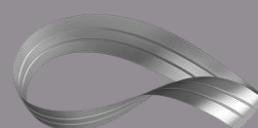
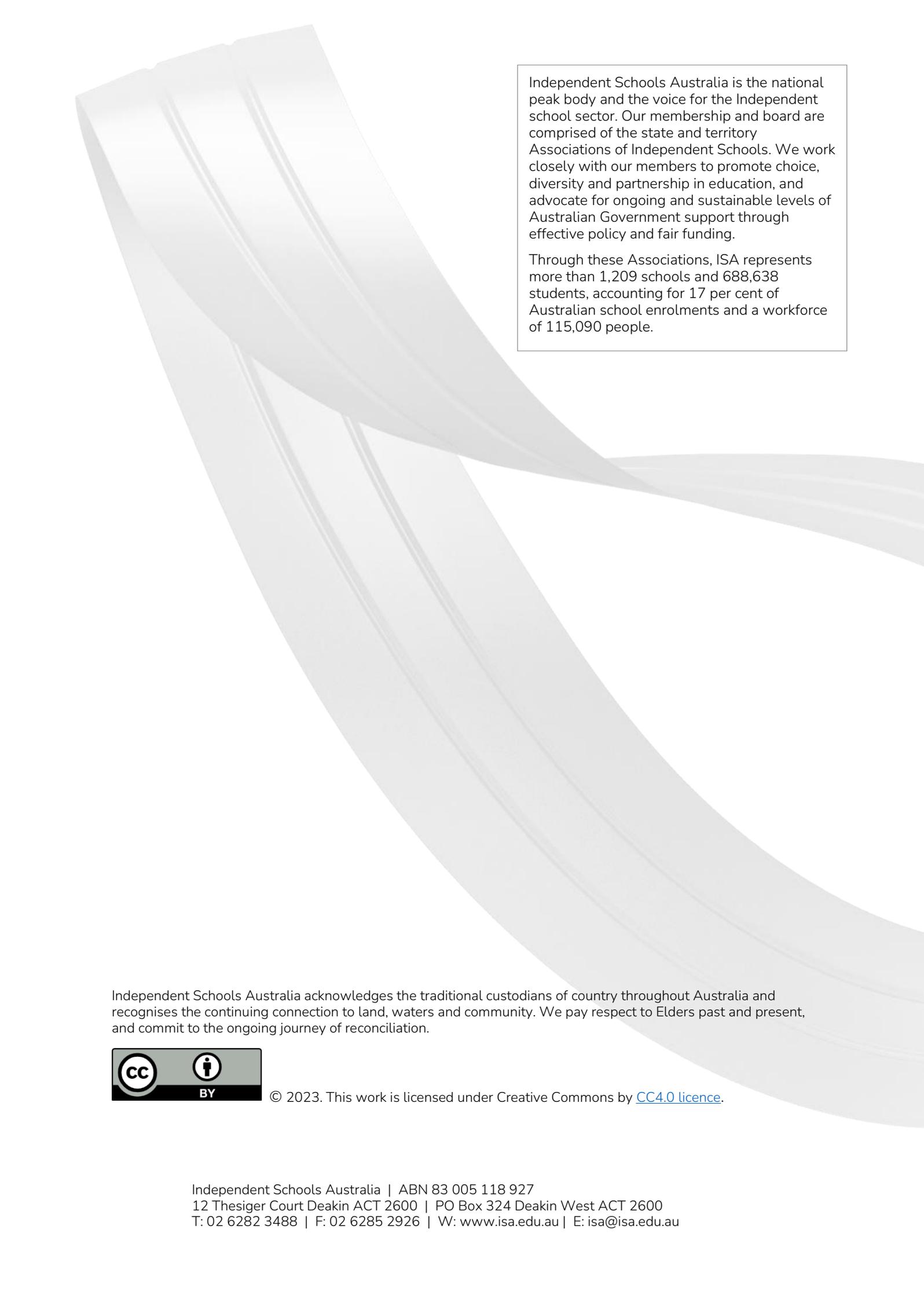

**NATIONAL SKILLS
PASSPORT
CONSULTATION
PAPER
ISA SUBMISSION**

16 February 2024



**INDEPENDENT
SCHOOLS
AUSTRALIA**



Independent Schools Australia is the national peak body and the voice for the Independent school sector. Our membership and board are comprised of the state and territory Associations of Independent Schools. We work closely with our members to promote choice, diversity and partnership in education, and advocate for ongoing and sustainable levels of Australian Government support through effective policy and fair funding.

Through these Associations, ISA represents more than 1,209 schools and 688,638 students, accounting for 17 per cent of Australian school enrolments and a workforce of 115,090 people.

Independent Schools Australia acknowledges the traditional custodians of country throughout Australia and recognises the continuing connection to land, waters and community. We pay respect to Elders past and present, and commit to the ongoing journey of reconciliation.



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1. INDEPENDENT SCHOOLS AUSTRALIA

Independent Schools Australia (ISA) is the national peak body representing the Independent school sector. Working with the eight state and territory Associations of Independent Schools (AISs), ISA's major role is to represent the sector on national issues and bring the unique needs of Independent schools to the attention of the Australian Government and community.

2. ABOUT THE INDEPENDENT SECTOR

Nationally, 688,638 students attend 1,209 Independent schools, and the latest available data shows that one in six Australian school students attends an Independent school and over one in five secondary students attends an Independent school. Independent schools employ approximately 115,000 people.

Independent schools are a diverse group and serve a wide range of communities. The median fee for an Independent school in 2021 was close to \$5,300, and the majority of Independent schools charge fees in the range of \$3,000 – \$5,500.

Most families with children enrolled in non-government schools are middle-to-low-income earners, increasingly from culturally diverse backgrounds, and residing in outer-suburban and inner-suburban communities. Many of these families are currently facing economic stress and are making substantial sacrifices for their children's education.

Independent schools are long-established partners in Australia's education system, alongside government and Catholic schools. They make a valuable contribution to society and the learning and wellbeing of Australian children.

Many Independent schools provide a religious or values-based education. Others promote a specific educational philosophy or interpretation of mainstream education. Many Independent schools have been established by community groups seeking to meet particular needs or to reflect the religious values of a community. Independent Catholic schools are a significant part of the sector, accounting for eight per cent of the Independent sector's enrolments.

Most Independent schools are set up and governed independently on an individual school basis. However, some Independent schools with common aims and educational philosophies are governed and administered as systems, for example, Lutheran schools. Systemic schools account for 20 per cent of schools in the Independent sector. Four out of five schools in the sector are autonomous non-systemic schools.

3. ABOUT THIS SUBMISSION

ISA has prepared this submission to provide feedback to the Australian Government's National Skills Passport Consultation Paper developed collaboratively by the Department of Education and the Department of Employment and Workplace Relations.

ISA consulted with the state and territory Associations of Independent Schools (AISs) in preparing this submission.

4. INTRODUCTION

ISA welcomes the opportunity to provide input to the Australian Government's National Skills Passport Consultation Paper to support workers in promoting their qualifications and helping businesses find appropriately skilled workers.

ISA represents the Independent school sector on national education issues, working closely with AISs to understand opportunities and challenges regarding Vocational Education and Training (VET), careers advice, funding, student training costs, staff skills accreditation and information regarding ongoing and new initiatives across states and territories.

VET qualifications are highly valued in the schooling sector, as they provide young people with educational opportunities to learn important knowledge and skills and develop employment-based skills and certification.

Many Independent schools:

- provide vocational education and training (VET) onsite as a registered training organisation (RTO) and organise placements for students in external VET courses or school-based apprenticeships
- offer careers advice to students and post school study and employment options
- form critical relations with industry and business to ensure robust and engaging VET courses and apprenticeships.

VET is increasingly becoming a focal point for senior students, providing not only transition into apprenticeships and further education and training, but also as entry into university through alternate entry programs or directly into employment. A National Skills Passport could be a practical way to share and validate skills and qualifications and ISA's submission on the National Skills Passport Consultation Paper outlines both challenges and opportunities for consideration.

AISs and individual Independent schools build ongoing strategic partnerships and relationships with universities, industry and local businesses. They link students to future study and employment opportunities and on the job training through RTO providers, whether these are school RTOs, AIS RTOs or external RTOs. A National Skills Passport could streamline processes at a national level to support students, employees and employers navigate study and employment.

5. KEY PRINCIPLES

ISA's submission provides feedback on the five key principles outlined in the National Skills Passport Consultation Paper.

5.1 Valuable and useful

Historically, there have been many efforts at both the state and national levels to address efficient recording and sharing of skills and training information. Different strategies have been used to record qualifications, and learning and training for individuals, however to date a national strategy has not been successfully implemented.

Career-based strategies include individual support for resume writing, job application processes and role modelling for job interviews. VET in Schools (VETiS) programs, part-time employment and work experience (place-based and virtual) have also had a significant impact on career choice, development and employment.

A career-focused approach is now well supported by online services such as the National Careers Institute,¹ myfuture² or Year13,³ an organisation which has conducted research to highlight the value of current, up-to-date, careers advice. The renewed national focus on career education leading to much better career planning and lifelong career development has added to this approach.

With a rise in over-exaggerated or false resumes, resumes written by AI and an increase in qualifications scams and fake documents, it could be of considerable advantage to employers to have

¹ [National Careers Institute - Department of Employment and Workplace Relations, Australian Government \(dewr.gov.au\)](https://www.dewr.gov.au)

² [myfuture - Australia's National Career Information Service | myfuture](https://myfuture.gov.au)

³ [Year13 - Create a life you're passionate about](https://year13.com.au)

access to a national, trusted, recognised record of knowledge, skills and experience for prospective employees to aid in their decision making and find the most suitable employee.

In this context it may be timely to consider a National Skills Passport to record qualifications, certification, knowledge, skills and experience to value-add to a career development approach. With the success of the Unique Student Identifier (USI), which has worked well to centrally record VET qualifications, and the proposed USI implementation for schools, it may now be possible for a National Skills Passport to be introduced.

If a National Skills Passport process could recognise and verify qualifications, this would simplify current processes which are many and varied. Keeping a record of qualifications, evidence of education, employment and training experience and having them verified or documents certified can be a time consuming and costly process.

A passport to verify education and training achievement could include senior secondary achievement, accredited VET qualifications and Higher Education qualifications. It could also include a range of accredited microcredentials. Having all documents in one digital platform that could be easily shared with selected stakeholders, could be of great benefit to individual students and employees.

A National Skills Passport would provide transparency of qualifications achieved and opportunities for authentic clarification of genuine achievements which would be of great value to employers and education institutions.

For this to be successful, there would need to be national recognition of the passport by governments, individuals, education and training stakeholders, professional employment and recruitment services, unions etc., and the willingness of individual users to provide their data. It could also be useful for industry registration authorities that require verification of qualifications for industry certification.

While potentially complex to introduce, it would also be advantageous to employers, certifying authorities and training providers if overseas applicants could verify their qualifications and work experience through a National Skills Passport process. A National Skills Passport could also support universities and other training providers to speed up admission processes that require verification of qualifications.

For a National Skills Passport to be valued, the following principles would also need to be considered, in terms of challenges, risks and opportunities.

5.2 User-centred

A user-centred design would be essential to a National Skills Passport so that individuals could easily navigate the process and upload their documents in a simple manner. In the future, there could be built-in flexibility for students to record additional achievements such as non-accredited and accredited microcredentials, volunteer and service engagement. As verification could prove a challenge, the National Skills Passport should initially focus on qualifications that can be rigorously verified.

The process would also need to be easy for employer-users and training providers to be able to verify employment and training history through a simple process, including part-time work and work experience. It would most likely need to be a scaled approach to manage workload for all stakeholders. For example, if Independent schools had to verify the achievements of past and present students, this would be a huge burden on an already over-loaded workforce. Such a process may not be possible until there is greater ease of transfer of relevant data between different types of users.

Developing a user-friendly model for easily recording and exchanging information, including online support for users, would be an essential part of any design to ensure equitable access and use. Affordability for the individual user is also a consideration so that all equity groups have the opportunity to access.

5.3 Integrated and interoperable

As outlined in the Consultation Paper, there is not a common data standard regarding qualifications and skills across the tertiary sector therefore ensuring consistency presents a challenge.

Developing a platform which has interoperability capacity with senior secondary education and tertiary providers would require the support of all stakeholders. Ensuring reliability of data and qualifications and experience verification would be essential to have wide-scale use.

Interoperability with career support services like myfuture and ease of access and updating of individual information would be an advantage, as would easy export of data to job-application tools and applications.

5.4 Trusted and reliable

Linking student management systems (SMS) to leverage data would require careful consideration and support across the schooling and tertiary sectors. Not only would stakeholders be concerned about the risks involved with privacy protection, cyber security and data management, there are a wide range of SMSs in use in the Independent school sector and some schools do not use an SMS.

Gaining state, territory and Commonwealth agreement on what is recorded, how data is gathered and presented, who would be the national data custodian, initial and ongoing funding etc would also be a significant hurdle to overcome.

For a National Skills Passport to have broad uptake and support of employers and employer groups such as the Australian Chamber of Commerce and Industry and union groups, the whole system would need to be rigorous, robust, secure and well-maintained.

Ensuring verification processes are reliable and valid would be essential for a National Skills Passport to be trusted and have wide-spread use. Including non verifiable qualifications, skills and experience may be useful, but could diminish the value of a National Skills Passport therefore to build trust, verifiable documentation should be the first priority.

A national data custodian would need to be established and funded to ensure data protection, security and privacy and have the capacity to maintain the data and keep it relevant to the needs of users through a trusted, integrated digital system.

5.5 Privacy enhancing and secure

ISA agrees that privacy is of the utmost importance and must be protected. Individual users should be able to select which aspects of their passport they would like to share with different stakeholders as some information may not be relevant to a particular purpose or employment opportunity. It would therefore be important for individual users to be able to select how they provide access to their data to a third-party user, such as one-off access or access for a period of time and be able to revoke access at any stage.

A National Skills Passport platform would need to be as secure as possible, utilising multi-factor authentication, high-level security and fraud protection, certified by a government agency and verifiable.

If a National Skills Passport is implemented, it would be advantageous for young people in their senior secondary years to be able to obtain one, so they could begin to upload VET qualifications and/or their senior secondary certificate and build from there.

6. CONCLUSION

There are a range of risks, challenges, benefits and opportunities surrounding the concept of a National Skills Passport as outlined in the above comments.

ISA looks forward to the continued development of this work by the Department of Education and the Department of Employment and Workplace Relations and would be pleased to be involved in further consultations as discussion and the formulation of a business case for a National Skills Passport progresses.

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