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Vice-Chancellor and Principal

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Mr Dave Sharma MP
Member for Wentworth
Chair, Joint Standing Committee on Treaties
PO Box 6021
Parliament House
Canberra ACT 2600
By email: jsct@aph.gov.au

Dear Mr Sharma,

Inquiry into the UNESCO Global Convention on the Recognition of Qualifications concerning Higher Education

The University of Sydney welcomes the opportunity to engage with this inquiry and supports the Committee recommending to the Parliament that Australia ratifies the [Global Convention on the Recognition of Qualifications concerning Higher Education](#) ('Convention').

The University has a significant global footprint, a diverse and talented student body drawn from more than 150 countries, the largest student mobility program in Australia and more than 50,000 alumni known to be living overseas. We welcome collaborative international initiatives, such as this Convention, which seek to facilitate global mobility for individuals and to promote closer international cooperation in higher education and research.

Our assessment of the Convention's terms and available supporting information is that the potential long-term benefits of ratification for students, graduates and employers are likely to significantly outweigh the possible extra administration costs that could arise for Australian higher education providers if an overly bureaucratic approach to implementation unintentionally creates additional complexity and red tape. While many of our professional qualifications are recognised extensively overseas, we are attracted to the benefits that ratification could deliver for future graduates of our other programs, by facilitating and streamlining the recognition of their qualifications overseas. Anecdotally, we are aware of graduates of ours and other universities sometimes experiencing lengthy delays and difficulties gaining recognition of their qualifications in some jurisdictions.

Australia is a world leader in international education and the Government set out its aspirations for the sector's future in its [Australian Strategy for International Education 2021-2030](#) released in November 2021. As an important contributor to Australia's international education successes, the University of Sydney is enthusiastic about Australia continuing to be part of this global effort to support the mobility of students and graduates, including by ensuring Australia's ongoing involvement in the UNESCO dialogue about higher education through participation in the biennial Intergovernmental Conference of the States Parties that will be established once the Convention takes effect. We also agree with the assessments contained in the National Interest Analysis prepared for the Parliament that Australia is well placed to demonstrate that it already satisfies most of the obligations under the Convention and that there will be no direct additional financial costs that arise from joining, beyond those associated with attendance at the Intergovernmental Conference.

The objectives and basic principles enshrined in the Convention are consistent with the University of Sydney's existing policies and practices, which we believe reflect the approaches taken by most institutions across the Australian higher education sector. The Convention recognises the public-good function of higher education, as well as the fundamental importance to the operation of providers and

national systems of upholding the principles of academic freedom and institutional autonomy. The Convention also recognises the importance, in terms of fostering trust and confidence in national higher education sectors, of having robust systems in place for the approval, recognition and quality assurance of their higher education institutions.

The University of Sydney is committed to applying fair, transparent, non-discriminatory and reliable admissions processes. We place the highest priority on educational quality, academic freedom, and equality of access. We have long-standing processes in place to support access to education for students from marginalised communities, including refugees, and strongly support the Convention's aspirations in relation to treatment of students from these backgrounds. Consistent with the objectives of the Convention, we believe that life-long learning is a social good that affirms the dignity of the individual and provides opportunity and prosperity for Australia and the international community.

Our only reservation about Australia ratifying the Convention is that, notwithstanding the text's repeated assurances about respecting institutional autonomy, participation may impose some additional administrative burdens on Australian universities by requiring them to review and potentially alter their current admissions practices significantly. By way of example, we note the wording of Article IV, which pre-empts a shift from an 'equivalence-based' approach to assessing qualifications, towards a test based on assessing 'substantial difference'. On this point, we do not currently agree with the statement at page 9 of UNESCO's [*Practical Guide to Recognition - Implementing the Global Convention on the Recognition of Qualifications Concerning Higher Education*](#) that an equivalence-based approach 'hinders the advancement of best practices in recognition'. In our initial assessment, we are concerned that such a shift in the approach to qualification recognition has the potential to significantly increase the administrative burden for providers.

Nevertheless, it is our expectation that this and any other implementation issues of potential concern to providers can be addressed progressively by the Australian Government working collaboratively with the sector, including through the establishment of appropriate domestic governance and ongoing consultation structures as required under Section V of the Convention. In this regard, we note with some concern the concluding text in the 'Attachment on Consultation' included in the National Interest Analysis: *'Any new obligations imposed can be implemented through administrative changes, which will be a matter for the Australian Government Department of Education, Skills and Employment. Accordingly, additional broader sector-wide consultation is not deemed necessary.'* On the contrary, we believe that the success of Australia's participation in this Convention will depend largely on how effectively the Australian Government works on implementation with the states, territories and higher education providers. To this end, we urge the Committee to recommend that, as a first step, the Department of Education, Skills and Employment consult with the states and territories and all relevant higher education and dual-sector peak bodies (Universities Australia, the Independent Tertiary Education Council of Australia, TAFE Directors Australia, the Council for Private Higher Education and the International Education Association of Australia) to agree how Australia can implement this Convention most efficiently and effectively.

We trust this feedback on the Convention is helpful and would be pleased to provide further information as required.

Yours sincerely,

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